TSD File Inventory Index

Date: 6-16-00

Initial: JK

Facility Name: Travenol Laboratories, Inc.

Facility Identification Number: ILD 000 666 180 (Old Folder Info)

A.1 General Correspondence		B.2 Permit Docket (B.1.2) B.2	
A.2 Part A / Interim Status A.2		.1 Correspondence	X
.1 Correspondence	X	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	X	C.1 Compliance - (Inspection Reports)	
.3 Part A Application and Amendments	X	C.2 Compliance/Enforcement C.2	X
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence	X	.4 RFA Reports D.1.4	X
.2 Closure/Post Closure Plans, Certificates, etc		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

.5 RFI QAPP		.6 CMI QAPP	
.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8 RFI Progress Reports		D.5 Corrective Action/Enforcement	
.9 Interim Measures Correspondence		.1 Administrative Record 3008(h) Order	
.10 Interim Measures Workplan and Reports		.2 Other Non-AR Documents	
D.3 Corrective Action/Remediation Study		E. Boilers and Industrial Furnaces (BIF)	
.1 CMS Correspondence		.1 Correspondence	
.2 Interim Measures		.2 Reports	
.3 CMS Workplan		F.1 Imagery/Special Studies (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	
.4 CMS Draft/Final Report		G.1 Risk Assessment	
.5 Stabilization		.1 Human/Ecological Assessment ...	
.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
.7 Lab Data, Soil-Sampling/Groundwater		.3 Enforcement Confidential	
D.4 Corrective Action Remediation Implementation		.4 Ecological - Administrative Record	
.1 CMI Correspondence		.5 Permitting	
.2 CMI Workplan		.6 Corrective Action/Remediation Study ...	
.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation ...	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Total 1

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not require individual folders per schedule

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

MAR 02 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Greg Janko
Travenol Laboratories Inc.
P.O. Box 490
Round Lake, Illinois 60073

RE: Interim Status Acknowledgement USEPA ID No. ILD000666180
FACILITY NAME: Travenol Laboratories Inc

Dear Mr. Janko:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: The Prudential Insurance Company of America

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

MAR 2 2 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Eugene E. McManus, Vice President
The Prudential Insurance Company of America
Prudential Plaza, Suite 3300
Chicago, Illinois 60601

RE: Interim Status Acknowledgement USEPA ID No. ILD000666180
FACILITY NAME: Travenol Laboratories Inc.

Dear Mr. McManus:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

TBS 03-19-82

Enclosure

cc: Travenol Laboratories Inc

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ • ILD000666180 REACKNOWLEDGEMENT

TRAVENOL LABORATORIES INC
PO BOX 490
ROUND LAKE IL 60073

INSTALLATION ADDRESS ➤ 3860 SUNSET AVE
WAUKEGAN IL 60085

EPA Form 8700-12B (4-80)

09/28/81

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA U.S ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

000987 AUG 2080

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS:

INSTALLATION'S EPA I.D. NUMBER: F ILD000666180 T/A 21 C

APPROVED: A

DATE RECEIVED (yr., mo., & day): 800818

I. NAME OF INSTALLATION

TRAVENOL LABORATORIES INC

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 PO BOX 490

CITY OR TOWN: 4 ROUND LAKE — ST.: IL — ZIP CODE: 60073

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 3860 SUNSET AVENUE

CITY OR TOWN: 6 WAUKEGAN — ST.: IL — ZIP CODE: 60085

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 JANKO GREG SECTION MGR PLT ENG

PHONE NO. *(area code & no.)*: 312-546-6311

V. OWNERSHIP

DETACH

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 TRAVENOL LABORATORIES INC

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [XX] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [X] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: ILD000666180

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 18 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S													T/A	C
W	I	L	D	0	0	0	6	6	6	1	8	0	2	1
1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001					
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- [X] 1. IGNITABLE (D001)
- [ ] 2. CORROSIVE (D002)
- [ ] 3. REACTIVE (D003)
- [ ] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
	Donald G. Madsen Vice-President, Production	8-15-80

EPA Form 8700-12 (6-80) REVERSE

TRAVENOL LABORATORIES, INC.

Law Department
Writer's Phone: (312) 948-4952

Deerfield, Illinois 60015
Telex: 724497
Cable: Travenol
Deerfield

March 2, 1981

U. S. Environmental Protection
Agency - Region V
230 South Dearborn Street
Chicago, Illinois 60604

RE: AMENDMENT TO HAZARDOUS WASTE PERMIT APPLICATION
I.D. NO.: ILD 000666180

Dear Sir or Madam:

On November 18, 1980, Travenol Laboratories, Inc. submitted the above-captioned application for its Waukegan, Illinois site. The purpose of this letter is to amend that application by deleting the reference to "treatment". The only "treatment" which occurs at the Waukegan site is distillation of Travenol's spent freon for reuse at another Travenol facility. Since 40 CFR 261.6 specifically states that only storage activities require a permit in such a case, the Waukegan site will require a permit for storage only, not for treatment. Accordingly, the "T04" references on Pages 1 of 5, 2 of 5, and 3 of 5 should be deleted.

I trust this letter is sufficient to make the change in the application. Please contact me at the above number if there are any questions concerning this.

Sincerely,

TRAVENOL LABORATORIES, INC.

Raymond T. Murphy
Assistant General Counsel

Sub to notification Part A

RTM:cs

CC: Prudential Insurance Company
of America
Prudential Plaza - Suite 3300
Chicago, Illinois 60601

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175 695

FORM 1 GENERAL — EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F I L D 0 0 0 6 6 6 1 8 0 3 D

LABEL ITEMS

- II. EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP TRAVENOL LABORATORIES INC.

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 JANKO GREG SECTION MGR PLT ENG	312 546 6311

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
3 P.O. BOX 490			
B. CITY OR TOWN	**C. STATE**	**D. ZIP CODE**	
4 ROUND LAKE	IL	60073	

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
5 3860 SUNSET AVENUE			
B. COUNTY NAME			
LAKE			
C. CITY OR TOWN	**D. STATE**	**E. ZIP CODE**	**F. COUNTY CODE *(if known)***
6 WAUKEGAN	IL	60085	097

NOV 19 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2831 (specify) Chemicals and Allied Products	3079 (specify) Rubber and Misc. Plastic Products

C. THIRD	D. FOURTH
3841 (specify) Surgical and Medical Instruments and Apparatus	(specify)

VIII. OPERATOR INFORMATION

A. NAME: TRAVENOL LABORATORIES INC

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☒ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL; S = STATE; P = PRIVATE; M = PUBLIC (other than federal or state); O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): A 312 948 2000

E. STREET OR P.O. BOX: ONE BAXTER PARKWAY

F. CITY OR TOWN: DEERFIELD

G. STATE: IL

H. ZIP CODE: 60015

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N N/A	9 P N/A

B. UIC (Underground Injection of Fluids)	E. OTHER (specify)
9 U N/A	9 Z 0905 0004 (specify) STATE AIR EMISSION PERMIT NUMBER (ILL)

C. RCRA (Hazardous Wastes)	E. OTHER (specify)
9 R	9 Z N/A (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. F9:B/50

XII. NATURE OF BUSINESS (provide a brief description)

Warehouse supporting manufacturing of chemicals and allied products, rubber and miscellaneous plastic products; and surgical and medical instruments and apparatus. Also stores hazardous wastes in 55-gallon drums. Majority of hazardous wastes is contaminated freon which will be distilled and reused.

F9:A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
	Donald G. Madsen Vice-President, Production	10/21/80

COMMENTS FOR OFFICIAL USE ONLY

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004 695

FORM 3 RCRA

EPA

U[illegible]NVIRONMENTAL PROTECTION AGENCY

HAZA[illegible]OUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S													T/A	C
F	I	L	D	0	0	0	6	6	6	1	8	0	3	1
1	2											13	14	15

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)* (71)

[ ] 2. NEW FACILITY *(Complete item below.)* (71)

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	76	11	01
15	73 74	75 76	77 78

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY
73 74	75 76	77 78

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS (72)

[ ] 2. FACILITY HAS A RCRA PERMIT (72)

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below):* A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S													T/A	C
C	D	U	P										3	1
1	2											13	14	15

LINE NUMBER	A. PROCESS CODE (from list above) (16 - 18)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify) (19 - 27)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code) (28)	FOR OFFICIAL USE ONLY (29 - 32)
X-1	S02	600	G	
X-2	T03	20	E	
1	S01	31,000	G	
	04	912,000	U	
3				
4				

LINE NUMBER	A. PROCESS CODE (from list above) (16 - 18)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (19 - 27)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code) (28)	FOR OFFICIAL USE ONLY (29 - 32)
5				
6				
7				
8				
9				
10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

III. B. Process Design Capacity - Line Number 2

T04 Freon Distillation Unit

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.
NOTE: Photocopy this page before completing if have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													T/A	C
W	I	L	D	0	0	0	6	6	6	1	8	0	3	1

FOR OFFICIAL USE ONLY													T/A	C		
W	D	U	P										3	2	D	U	P

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)				D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F 0 0 1	355 000	T	S 0 1	T 0 4			
2	F 0 0 2	89 000	T	S 0 1				
3	D 0 0 1	23 000	T	S 0 1				
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE

EPA I.D. NO. *(enter from page 1)*

S												T/A	C
F	I	L	D	0	0	0	6	6	6	1	8	3	6

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* F6:A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* F6:B/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
42 23 017 N 17Ø	087 53 044 W 44Ø

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E The Prudential Insurance Company of America	312-861-4823

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F Prudential Plaza, Suite 3300	G Chicago	IL	60601

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
THE PRUDENTIAL INSURANCE COMPANY OF AMERICA	by Eugene E. McManus, Vice President	11/12/80

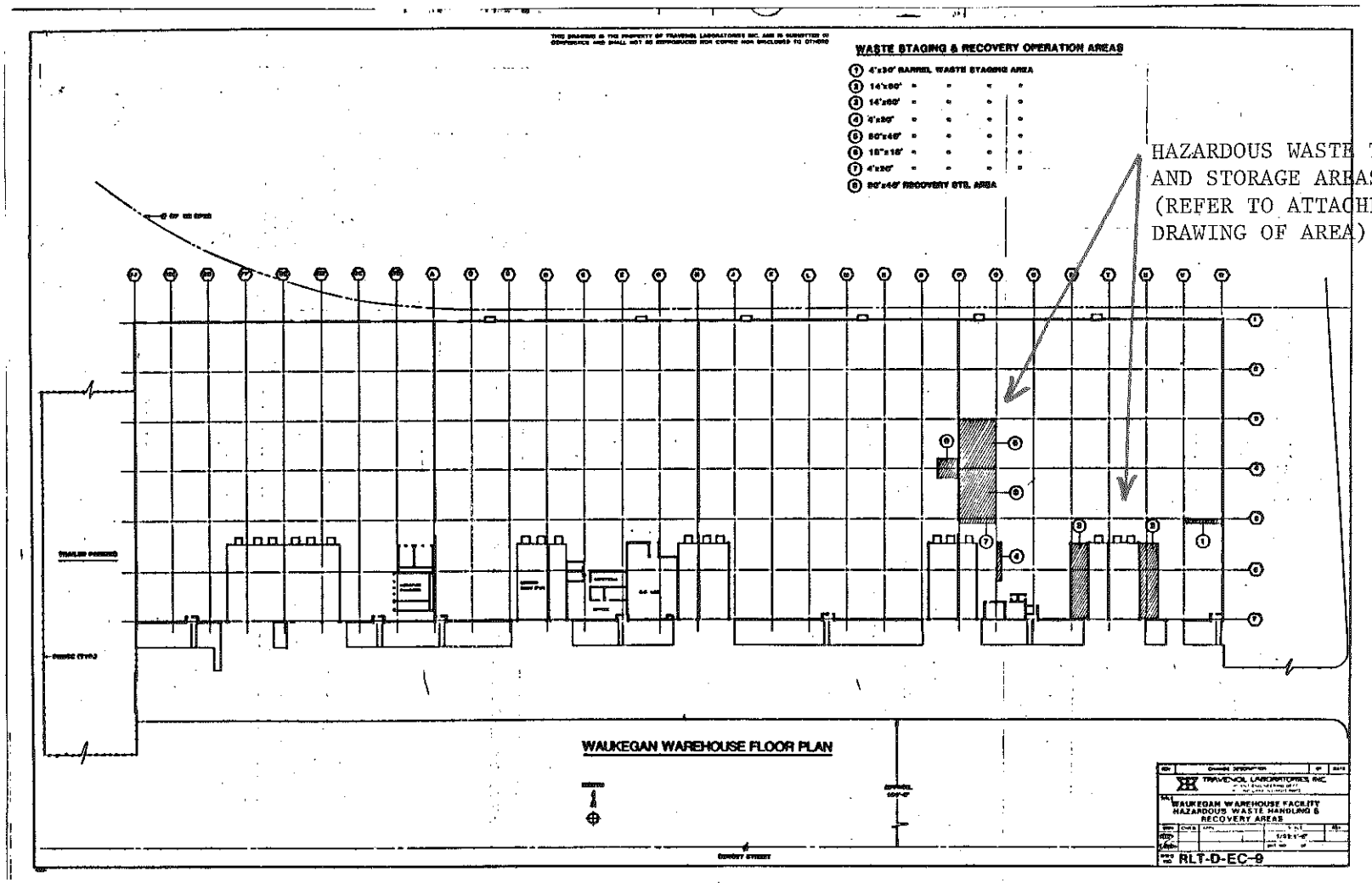
X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
	Donald G. Madsen Vice-President, Production	10/21/80

Continued from page 4

V. FACILITY DRAWING *(see page 4)*



COPY REDUCTION ; SCALE APPROXIMATELY 1" = 128'

Form Approved OMB No. 158-S80004

695

TRAVENOL LABORATORIES, INC.

Law Department
Writer's Phone:
(312) 948-4952

Deerfield, Illinois 60015
Telex: 724497
Cable: Travenol
Deerfield

November 17, 1980

U.S. Environmental Protection Agency
Region V
RCRA Activities
P. O. Box 7861
Chicago, IL 60680

Re: Hazardous Waste Permit Application
Waukegan Facility (EPA I.D. No. ILD 000666180)

Dear Sir or Madam:

Enclosed are the following completed documents which comprise Part A of the Hazardous Waste Permit Application for Travenol's warehouse facility at 3860 Sunset Avenue, Waukegan, Illinois:

- USEPA Consolidated Permits Form 1, "General Information," with topographic map.
- USEPA Consolidated Permits Form 3, "Hazardous Waste Permit Application," with facility drawing and facility photographs.

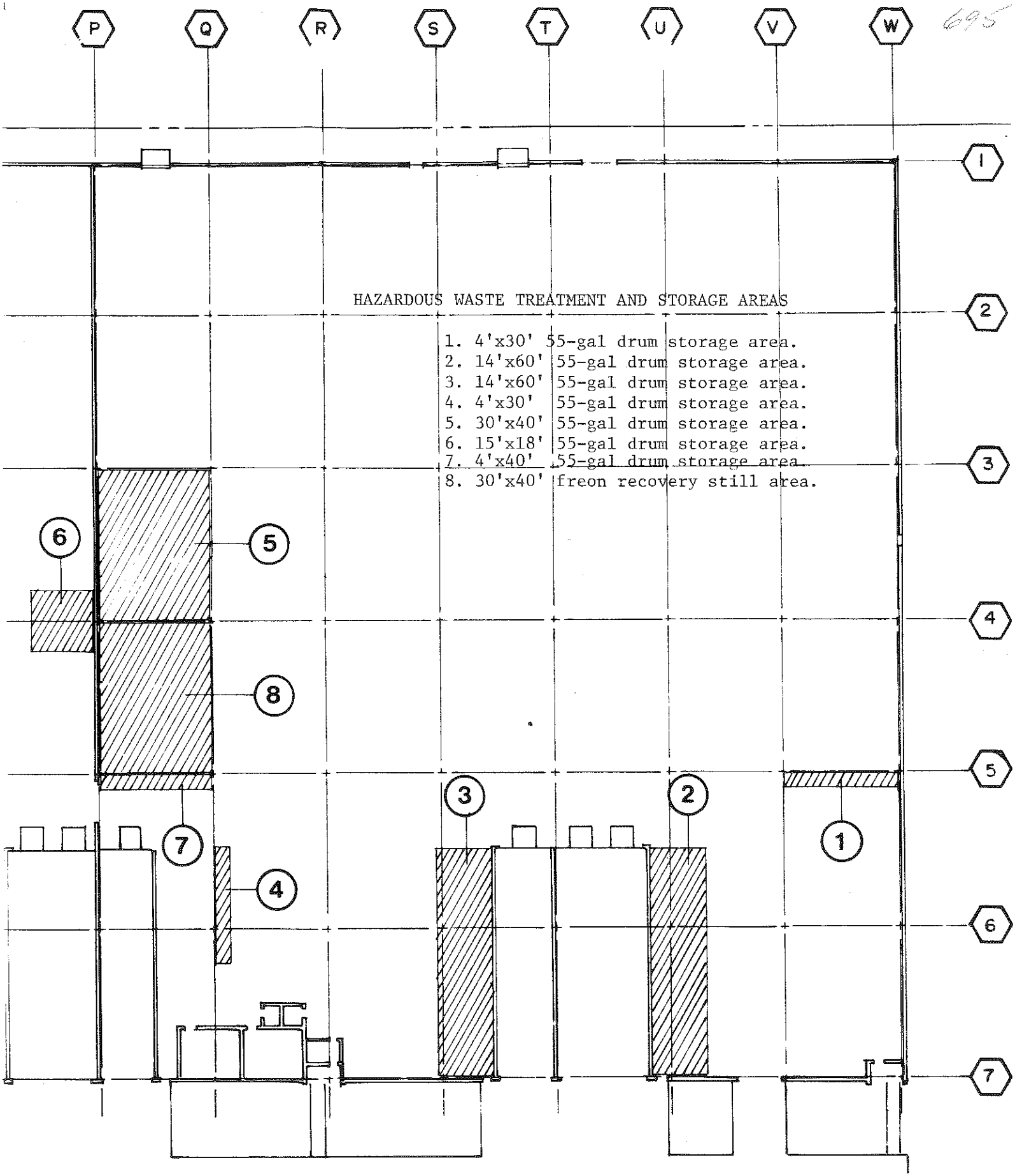
With regard to Items III and IV on Form 3, we have not included small quantities of various laboratory wastes. Generally, these materials are either neutralized, diluted or otherwise treated in accordance with good laboratory practice to make them suitable for disposal down the drain with no threat to the environment.

We trust that this application is complete. Should you have any questions, please call me at the telephone number noted above or William R. Blackburn at 312-948-4962.

Very truly yours,

Raymond T. Murphy
Environmental Counsel

RTM:jk



SCALE 1" = 32'

DETAILED DRAWING
HAZARDOUS WASTE TREATMENT
AND STORAGE AREAS

WAUKEGAN WAREHOUSE
TRAVENOL LABORATORIES, INC.

ILD08 2939067
ILD000666180
ILD067989725
Travernal

November 6, 1980

Mr. Raymond T. Murphy
Environmental Counsel
Travernal Laboratories, Inc.
Deerfield, Illinois 60015

Dear Mr. Murphy:

Your letter of October 13, 1980, questioned whether a recycled waste was to be included in the total waste produced at a site for the purpose of determining eligibility for the small quantity generator exemption (40 CFR Part 261.5). The regulations imply that recycled waste is to be counted towards the total amount of waste produced at the site. However, during conversations with EPA headquarters, we were made aware of proposed amendments to the regulations. One amendment states that waste which is hazardous because of its characteristics and is being legitimately reused and recycled is excluded from the quantity of wastes used in determining a small quantity generator. It must be stressed this change becomes effective only when it is published in the Federal Register. Until that time, you are subject to the present regulations.

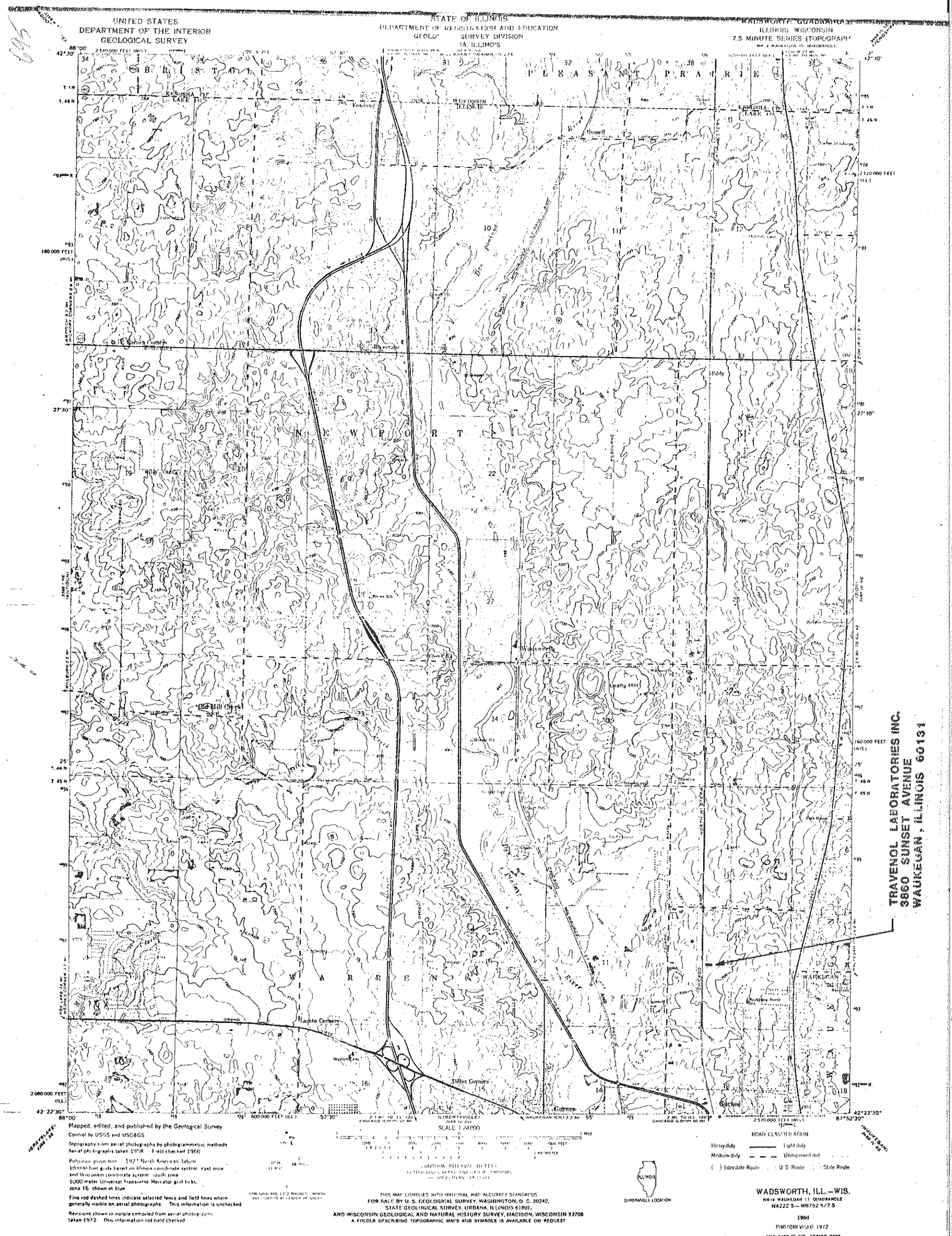
If you have any further questions please feel free to contact Dr. David Homer of my staff at (312) 886-3790.

Sincerely,

Jay S. Goldstein, Chief
Hazardous Waste Management Section

5A&HMD:JSG:ds/11/6/80


LF-2



TRAVENOL LABORATORIES INC.
3860 SUNSET AVENUE
WAUKEGAN, ILLINOIS 60131

NOTE: ALL BUILDINGS (FACILITIES) WITHIN 1/4 MILE OF SITE UTILIZE CITY OF WAUKEGAN POTABLE WATER SYSTEM.

A.4 Closure/
Post-Closure

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 0971900016 -- Lake County
Travenol Laboratories, Inc.
Closure Plan Approved: September 16, 1985 Log #87
ILD000666180

June 16,1986

Travenol Laboratories, Inc.
Attn: Raymond P. Murphy
Assistant General Council
Law Department
Deerfield, Illinois 60015

Dear Mr. Murphy:

The subject hazardous waste management facility was inspected by a representative of this Agency on January 29, 1986. The inspection revealed that the closure activity was completed in accordance with the approved closure plan dated September 16, 1985.

Certification that the hazardous waste container storage area had been closed in accordance with the approved closure plan by the owner/operator, Travenol Labs, and an independent registered professional engineer, Clemon A. Vath, of Illinois was received at this Agency January 14, 1986.

The Agency has determined that the closure of the hazardous waste container storage area has met the requirements of Interim Status Standards, 35 Ill. Admin. Code, Part 725 (40 CFR, Part 265). Please note, the Agency has withdrawn your Part A application to reflect status change due to completed closure activities.

This facility must continue to meet applicable requirements of 35 Ill. Adm. Code Part 722 -- Standards Applicable to Generators of Hazardous Waste and Part 723 -- Standards Applicable to Transporters of Hazardous Waste.

In accordance with the requirements of 40 CFR 265.143(h), further maintenance of your financial assurance mechanisms for the Waukegan facility is no longer needed.

If you have any questions, please contact Marla Laymon at the above number.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:ML:jab/1250F/2

cc: Northern Region
USEPA Region V, Ann Budich
Clemon A. Vath, P.E.
Division File
Financial Assurance Unit
Compliance Monitoring -- Mark Haney

TRAVENOL LABORATORIES, INC.

Law Department
Writer's Phone: (312)948-4952

Deerfield, Illinois 60015
Telex: 724497
Cable: Travenol
Deerfield

April 15, 1985

HWEB

Illinois EPA
Division of Land Pollution
2200 Churchill Rd.
Springfield, IL 62706

Re: U.S. EPA No. ILD 000666180 G, TRS, TSD, PA
Illinois No. 0971900016

Dear Sir or Madam:

This is to inform you that Travenol's warehouse facility in Waukegan, Illinois will no longer be receiving spent Freon from our manufacturing plant in Round Lake for distillation. The still was moved to Round Lake in July 1984, (See attached letter in which the Air Permit Division was advised of this move). The Freon is now reclaimed on-site in Round Lake. All spent Freon and still-bottoms have been either returned to Round Lake for reuse or sent to Custom Organics in Chicago for reclaiming. These transfers were made with proper Illinois manifests and special waste authorization (authorization numbers 841622 and 922866) and there is no longer any hazardous waste at the site.

Since we do not intend to use the Waukegan site for any future hazardous waste activities, we wish to simply withdraw the Notification of Hazardous Waste Activity and the Part A application, thereby terminating both generator status and interim status as a storage facility. The warehouse will continue in operation only as a raw material and supplies storage site. Inasmuch as 1) there is no hazardous waste located at the facility and no equipment to be decontaminated and 2) there are no specific technical closure requirements for containers in Sections 725.270-725.277 of the Illinois Hazardous Waste Regulations, it would appear that a simple withdrawal of the Notification and Part A application should be sufficient for this purpose rather than going through a formal closure process. Nonetheless, a copy of the facility's Closure Plan is attached for your information. Unless we are advised otherwise by your office, we will assume that this notice is sufficient to withdraw the Notification and Part A application for the Waukegan facility.

It should be noted that the Part A application for this site included, in addition to the spent Freon, twenty-three tons of a prepolymer designated as EPA number D001. This material was in storage at the warehouse in November, 1980 due to a move of some production operations to one of our Puerto Rican facilities. It was disposed of in early 1981. Since then, the facility has handled no hazardous wastes other than spent Freon and still bottoms.

If you require any further information, please do not hesitate to call me at the number noted above.

Sincerely yours,

Raymond T. Murphy
Assistant General Counsel

RTM/la:5371z

cc: U.S. EPA Region V
Hazardous Waste Permit Section
Federal Bldg.
230 S. Dearborn St.
Chicago, Il 60604

bcc: G. Janko, RLT-12
M. Smith, DF 4-3E
WRB/VS/MKS/RLT Air Permits (79050004)

(312) 948-4952

July 27, 1984

Illinois Environmental Protection Agency
Air Permit Division
2200 Churchill Road
Springfield, Illinois 62706

Re: Modification of Permit to Operate
I.D. No. 097190ADM; Application No. 79050004

Dear Sir or Madam:

This is to inform you that the Freon recovery still operating under the above-captioned permit at Travenol's warehouse in Waukegan will be moved to our Round Lake Facility. Accordingly, the address for the operator and location of the emission source (Items 2 and 3 on form APC 200) should be changed from 3850 Sunset Avenue, Waukegan to Route 120 and Wilson Road, Round Lake, Illinois 60073. The still is expected to begin normal operation at the new location on July 30, 1984.

We are in the process of setting up a new filter washing operation which may affect the amount of Freon recycled and will submit an amended permit application form as soon as all have the necessary data.

Please note that the current permit refers to this still as a "40 GPH Detrex Still" manufactured by Detrex Chemical Company. This is not correct. In a letter dated March 4, 1980 (copy attached) we advised your office that the manufacturer had been incorrectly identified on our original application (dated April 30, 1979). As indicated in the March 4, 1980 letter, please change the description of the still to the following:

Custom Model CRS-40C-WR Solvent
Recovery Still manufactured by Crest Ultrasonics Corporation

If you require any further information to affect this change in the permit, please call me at the number listed above.

Sincerely yours,

Raymond T. Murphy
Assistant General Counsel

RTM/MKS:eez:1346z
Attachment

CLOSURE PLAN AND COST ESTIMATE

RCRA HAZARDOUS WASTE PROGRAM

TRAVENOL LABORATORIES, INC.

WAUKEGAN, ILLINOIS

EPA I.D. NO. ILD000666180

Date Issued April 24,1981
Rev.1 Date Revised May 18, 1981
Rev.2 Date Revised September 27,1982
Rev.3 Date Revised January 12, 1983
Rev.4 Date Revised March 15, 1984
Rev.5 Date Revised March 30, 1985

Travenol Laboratories, Inc.
Waukegan, Illinois

CLOSURE PLAN
RCRA Hazardous Waste Program
INDEX

A. Introduction

The purpose of this plan is to fulfill the requirements of the U.S. Environmental Protection Agency (EPA) regulations promulgated pursuant to the Resource Conservation and Recovery Act (RCRA) relating to Closure Plan and Estimated Costs for Closure.

This Closure Plan will describe the procedures which will be carried out and estimated cost to completely close the Hazardous Waste Storage Facility at Travenol Laboratories, Inc., Waukegan, Illinois.

A copy of the Closure Plan and all revisions to the plan will be kept at the plant until closure is completed and a certification of closure is submitted to the U.S. EPA Regional Administrator.

B. Facility Closure Description

Travenol's Hazardous Waste Storage Facility at Waukegan will be closed at the end of the manufacturing plant's life, or when production processes can no longer be expected to generate hazardous wastes. The normal storage operation consists of storing the fifty-five gallon drums in specific Hazardous Waste Storage Areas. Refer to attached Site Plan.

C. Maximum Waste Inventory

The types and maximum inventory of hazardous wastes in storage at any given time during the life of this facility are given in Attachment 1-C.

D. Disposal or Equipment Decontamination

At such time as the Storage Facility is closed, all hazardous waste storage containers (fifty-five gallon drums) will be shipped offsite to an approved Treatment, Storage, Disposal or Recycling Facility. Collection containers used for the collection of acute hazardous wastes shall be triple rinsed and handling equipment decontaminated. The rinsate will also be shipped offsite to an approved facility.

E. Final Closure Time Schedule

	Dates (Estimated)
1. The Corporate Legal Department shall be notified at least 270 days before the date the plant expects to begin closure.	
2. Travenol must submit its Closure Plan to the U.S. EPA Regional Administrator at least 180 days before the date the plant expects to begin closure.	

Note: Travenol must submit its Closure Plan to the U.S. EPA Regional Administrator no later than 15 days after:

a. Termination of interim status, except when a permit is issued to the facility simultaneously with termination of interim status; or

b. Issuance of a judicial decree or compliance order under Section 3008 of RCRA to cease receiving wastes or close.

3. The U.S. EPA Regional Administrator will approve, modify, or disapprove the plan within 90 days of its receipt.

	Dates (Estimated)
4. Anticipated date hazardous waste will no longer be generated and received at the storage facility. Closure will commence within 30 days after the date on which Travenol receives the final volume of wastes.	2010
5. Within 90 days after receiving the final volume of hazardous wastes, or 90 days after approval of the Closure Plan, whichever is later, Travenol will ship offsite all hazardous wastes and rinsate, and decontaminate all equipment in accordance with this Closure Plan.	
6. Intervening milestone dates - none.	
7. Anticipated date all closure activities will be completed. Estimated total time required to close facility - 90 days.	2010

F. Closure Certification

When closure is completed, Travenol will submit to the Regional U.S. EPA Administrator certification both by Travenol and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved Closure Plan.

G. Facility Closure Cost Estimate

The estimated cost of closing this hazardous waste facility are given in Attachments 1-A and 1-B. These costs include the proper handling of the maximum quantity of hazardous wastes which might be accumulated during the life of the facility (including on-site treatment and/or offsite treatment, storage, and/or disposal).

H. Closure Plan Amendments

Travenol may amend the Closure Plan at any time during the active life of the facility. The Plan and attachments shall be amended and signed within 60 days if any of the following occur:

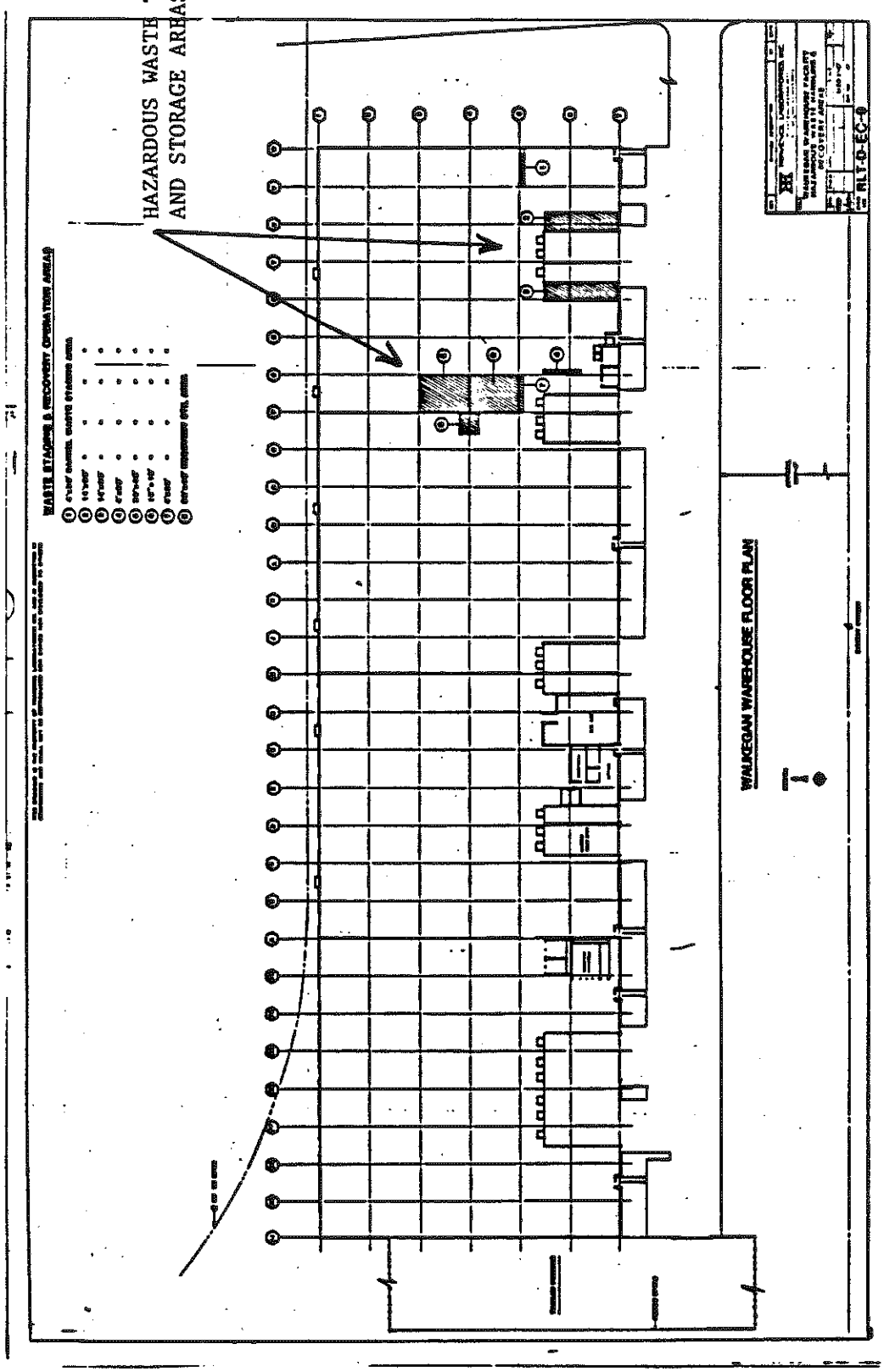
1. Change in operating plans or facility design affecting the Closure Plan.

2. Change in the expected year of facility closure.

The Closure Plan and all Attachments will be reviewed, updated and signed by the plant Environmental Coordinator/Plant Manager within 30 days of the anniversary of the previous update. This annual updating will include any adjustment required as a result of inflation (through use of the Gross National Product Deflator as published by the U.S. Department of Commerce in its Survey of Current Business) or any other changes.

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING *(see page 4)*



COPY REDUCTION ; SCALE APPROXIMATELY 1" = 128'

Travenol Laboratories, Inc.

PLANT: Waukegan, Illinois

ATTACHMENT 1 - A

HISTORICAL SUMMARY OF ESTIMATED CLOSURE COST

	[LAST YEAR'S CLOSURE COST	X (CURRENT PRICE DEFLATOR	÷ LAST YEAR'S PRICE DEFLATOR)]	= CURRENT CLOSURE COST ESTIMATE	NAME	SIGNATURE	DATE	REASON FOR CLOSURE COST MODIFICATION
1983	--	208.51	--	35,000	MICHAEL L SMITH	Michael L Smith	3/29/83	No equipment rinsing needed
1984	35,000	216.29	208.51	36,306	Gregory Janko	Gregory Janko	3/15/84	Annual Review
1985	36,306	226.10	216.29	37953	Gregory Janko	Gregory Janko	3/30/85	Annual Review
1986								

NOTE: The closure estimate must be updated within 60 days of any facility change affecting the cost of closure and must be adjusted for inflation within 30 days of each anniversary of the last estimate.

Travenol Laboratories, Inc. Plant: Waukegan, Ill

ATTACHMENT 1-B

Summary* of Estimated Costs to Close Storage Facilities

	WASTE STREAM NO.1	WASTE STREAM NO.2	WASTE STREAM NO.3	WASTE STREAM NO.4	WASTE STREAM NO.5	TOTAL
1. Removal and proper disposal maximum inventory of hazardous wastes in storage on the site at any given time during the life of the complex.	22,000	3,500	5,500			31,000
2. Clean-up, removal of contaminated soil and site restoration for final closure of Storage Facilities.						0
3. Decontamination of all collection containers, equipment, and tanks and disposal of rinsate or other resulting waste.						0
4. Administrative/supervisory costs to execute Closure Plan.						3,000
5. Certification by an independent registered professional engineer that the Storage Facilities have been closed in accordance with the specifications in the approved Closure Plan.						1,000
TOTAL	22,000	3,500	5,500			35,000

Implicit Price Deflator for Gross National Product 208.51

Michael L Smith
Signature of Preparer

3/29/83
Date

*See Attachment 1-C for details

Section Manager - Environmental Engineering
Title

ATTACHMENT 1-C

PLANT: Waukegan, Ill Basis of Estimated Cost to Close Facility

1. Hazardous Waste Inventory

Waste Stream	1	2	3	4	5	Total
a. Description of Waste Stream	Spent Freon	Freon Still Bottoms	Spent Solvents			-
b. Maximum Quantity Stored	22,000 gal	3,500 gal	5,500 gal			31,000 gal
c. Maximum Quantity Treated	0	0	0			0
d. Total b + c	22,000 gal	3,500 gal	5,500 gal			31,000 gal
e. Likely Disposal Method	Incineration	Incineration	Incineration			--
f. Estimated Maximum Transportation Distance to Disposal Site	200 miles	200 miles	200 miles			--
g. Total Estimated Collection, Transportation & Disposal Costs	$22,000	$3500	$5500			$31,000
h. Cost Basis	$1,00/gal	$1.00/gal	$1.00/gal			
i. Accuracy of Estimated Costs	±15%	±15%	±15%			-

2. Clean-up, Removal, and Restoration of Contaminated Soil for Total Facility

a. Estimated volume of contaminated soil: 0 cubic yards.

b. Likely method of disposal: N/A

c. Estimated distance to disposal facility: N/A miles.

d. Description of likely restoration activities (e.g. replacement of soil, planting vegetation):

None

e. Total estimated cost of collection, transportation, disposal and restoration: $ 0

3. Equipment and Facility Decontamination for Total Facility

a. List all acute hazardous waste treatment or storage equipment remaining contaminated after removal of waste inventory (e.g. tanks, floor, piping):

None

b. List all equipment likely to be contaminated with acute hazardous wastes as a result of waste handling, removal of contaminated soil, and other closure procedures (e.g. collection cans, fork lift, front end loader, truck bed, shovels, boots, clothing):

None

c. List method of decontamination of all items listed under "a" and "b" above:

Item	Method of Decontamination	Quantity of Hazardous Waste Resulting
____	None	
____		
____		
____		

d. Likely method of disposal: N/A

e. Estimated maximum distance to disposal facility:

0 miles

f. Total estimated cost of decontamination, collection, transportation and disposal: $ 0

g. Cost basis: _____

h. Accuracy of estimated costs: _____

MLS/pal

B. Permit Application /Post Permit

P4866525 75

Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: # 0311950002 -- Cook County
Baxter Healthcare Corp.
ILD 082939067
RCRA - Permits

May 6, 1988

Baxter Healthcare Corp.
6301 Lincoln Avenue
Morton Grove, Illinois 60053

Attn: Environmental Coordinator or
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart B. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For you convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the rgistered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to $25,000 per day of noncompliance.

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9875.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JKM:dks/1238j/1244j/1-3

Enclosures

cc: Division File
Compliance
Maywood Region
USPEA Region V

C.2 Compliance/
Enforcement

INSPECTION REVIEW FORM

ID NO.: ILD000666180

FACILITY NAME: Travenol Laboratories Inc.

LOCATION: 3860 Sunset Avenue
Waukegan, Illinois 60073

OPERATION: G T (TSD) Treatment/Storage INSPECTOR: (S) E J

DATE OF INSPECTION: 5/21/82 TYPE OF INSPECTION: 1. (CEI) 2. CSI

NAME OF REVIEWER: E. Davis DATE: 9/29/82

COMPLIANCE STATUS: (IN) OUT NON-REG

VIOLATION CLASS: NONE I II III

ACTION: _____

RECOMMENDED EPA ACTION: (NONE) MONITOR STATE LETTER ADM. COMPLAINT REFERRAL

DATE REFERRED TO UNIT CHIEF: _____

ASSIGNEE: _____ DATE ASSIGNED: _____

ENFORCEMENT ACTIONS

TYPE	ENFORCEMENT ACTION ISSUED	ENFORCEMENT ACTION DUE	STATUS CODE	STATUS DATE	PENALTY ASSESS	PENALTY COLLECT	STATE OR EPA	LINK	RESP. PERSON	ATTORNEY CODE

cc: Unit Inspection Log
Versar

ILLINOIS EPA
Environmental Protection Agency
1701 S. First Street Maywood, IL. 60153

#876

312/345-9780

Refer to: 09719016 - Lake County - Waukegan/Travenol Laboratories, Inc.

August 26, 1982

Travenol Laboratories, Inc.
3860 Sunset Avenue
Waukegan, Illinois 60073

Attn: Gregory Janko, Section Manager

Gentlemen:

An inspection of the above facility was conducted by a representative of the Illinois Environmental Protection Agency (IEPA) on May 21, 1982. A copy of the inspection report is enclosed. The purpose of the inspection was to determine your facility's compliance with the Environmental Protection Act, Ill. Rev. Stat. 1982, Ch. 111 1/2, pars. 1001 et seq., as amended, and regulations adopted by the Illinois Pollution Control Board. At the time of the inspection it appeared as though your facility was in compliance.

Your cooperation and efforts in this matter are appreciated. Should you have any questions about the report, please contact Charles Gruntman at the above number.

Sincerely,

Kenneth P. Bechely /cjg

Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:CJG:prb

Enclosure: Inspection Report

cc: Division File
Northern Region
USEPA - Region V

ISS

ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C 0 5 5 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. 0 9 7 1 9 0 1 6
(11) (18)

Lake CO. - L.P.C. Region # N Date 05/21/82
(20) (25)

Waukegan / Travenol Labs ILD000666180 Letter Sent (Yes or No) Yes
(Location) (Responsible Party) (26)

Samples Taken: Yes ( ) No (X) Time: From 02 : 30 p m Weather Moderate Rainfall
Ground Water( ) Surface( ) Other( ) To 03 : 30 p m
Photos Taken: Yes ( ) No (X) Interviewed Greg Janko Inspector D M S
(27) (29)

Previous Inspection None Previous Correspondence None Site Open: Yes(X) No( )

OPERATIONAL STATUS:		TYPE OF OPERATION:				AUTHORIZATION:	
Operating	(X)	Landfill	( )	Storage	( )	E.P.A. Permit	( ) N/A
Temporarily Closed	( )	Random Dump	( )	Salvage	( )	Variance	( )
Closed Not Covered	( )	Other Treat/Stor	(X)	A.C.D.	( )	21(e)	( )
Closed and Covered	( )	Quantity Received Daily(1-6)		1 (30)		Board Order	( )
						Illegal (5)	( ) (31)

IMPROVED

LPC 4 1/79 5,000

SAME

DETERIORATED

I S or D S
(62)

GENERAL REMARKS: Although our E.D.P. Complete Site List shows a file heading for Waukegan / Travenol Labs, we do not have a file for this site in the file cabinet.
Treatment includes the recovery of Freon from waste [illegible] oil by distillation and the storage includes the still bottoms from the treatment process placed in 55-gallon drums. According to Mr. Janko, for every 20 drums of Freon/[illegible] oil waste, 14 drums of Freon is reused and

INTERVIEW: 6 drums of still bottoms goes to disposal.

The facility appears to be in general compliance with IPCB requirements for treatment and storage of hazardous waste.

DIAGRAM:

cc: Nathaniel [illegible]
U.S.EPA

100

STATE IDENTIFICATION NUMBER
(If Applicable) 0971901 6

ILD000666180
EPA IDENTIFICATION NUMBER

0971900022-G

#876

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: TRAVENOL LABORATORIES INC.

(B) Street: 3860 SUNSET AVENUE

(C) City: WAUKEGAN (D) State: ILLINOIS (E) Zip Code: 60023

(F) Phone: 312/546-6311 (G) County: LAKE

(H) Operator: TRAVENOL LABORATORIES, INC.

(I) Street: ONE BAXTER PARKWAY

(J) City: DEERFIELD (K) State: ILLINOIS (L) Zip Code 60015

(M) Phone: 312/948-2000 (N) County: LAKE

(O) Owner: THE PRUDENTIAL INSURANCE COMPANY OF AMERICA

(P) Street: PRUDENTIAL PLAZA, SUITE 3300

(Q) City: CHICAGO (R) State: ILLINOIS (S) Zip Code: 60601

(T) Phone: 312/861-4823 (U) County: COOK

(V) Date of Inspection: 5-21-82 (W) Time of Inspection (From) 2:30 pm (To) 3:30 pm

(X) Weather Conditions: MODERATE RAINFALL ≈ 65°F

CC: NORTHERN REGION
USEPA REGION V
TRAVENOL LABORATORIES

PAGES 11-17, 21, & 23 ARE NOT APPLICABLE AND HAVE BEEN OMITTED.

Rev. 3-6-81/J.B.

(Y) Person(s) Interviewed	Title	Telephone
GREG JANKO	SECTION MANAGER	312/546-6311
DAN WEGNER	WAREHOUSE SUPV.	312/662-0585

(Z) Inspection Participants	Agency/Title	Telephone
DAN SHANE	IEPA / ENV PROT SPEC	312/345-9780
CHUCK GAUNTMAN	IEPA / ENV PROT SPEC	312/345-9780

(AA) Preparer Information

Name	Agency/Title	Telephone
DAN SHANE	IEPA / ENV. PROT SPEC	312/345-9780

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

I A. Storage and/or Treatment
   1. Containers (I)
   2. Tanks (J)
   3. Surface Impoundments (K)
   4. Waste Piles (L)

___B. Land Treatment (M)

___C. Landfills (N)

___D. Incineration and/or Thermal Treatment (O and P)

Q E. Chemical, Physical, and Biological Treatment (Q)
FREON DISTILLATION UNIT.

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDAP :
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	—	✓	NOT Applicable
2. Facility expansion?	—	—	✓	NOT Applicable
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓	—	—	
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	✓	—	—	
) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓	—	—	
2. Artificial or natural barrier around facility?	—	—	✓	STORAGE inside Building
3. Controlled entry?	✓	—	—	
4. Danger sign(s) at entrance?	—	—	✓	STORAGE inside Building
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	✓	—	—	
2. Records of operator error?	✓	—	—	
3. Records of discharges?	✓	—	—	

t Inspected

	Yes	No	NI*	Remarks
4. Inspection schedule?	✓			
5. Safety, emergency equipment?	✓			
6. Security devices?	✓			
7. Operating and structural devices?	✓			
8. Inspection log?	✓			
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	✓			
2. Job descriptions?	✓			
3. Description of training?	✓			
4. Records of training?	✓			
5. Have facility personnel received required training by 5-19-81?	✓			
6. Do new personnel receive required training within six months?	✓			
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?			✓	NOT REQUIRED
2. No smoking signs?			✓	NOT REQUIRED
3. Separation and protection from ignition sources?			✓	NOT REQUIRED

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

	Yes	No	NI*	Remarks
(A) Maintenance and Operation of Facility: Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	✓			
2. Telephone or 2-way radios at the scene of operations?	✓			
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control:

_____

_____

(C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			
2. Is emergency equipment maintained in operable conditions?	✓			
(D) Has owner or operator provided immediate access to internal alarms? (if needed)	✓			

*NI = Not Inspected

(E) Is there adequate aisle space for unobstructed movement? ✓ ___ ___ _____

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	✓			
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	✓			
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓			
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	✓			
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	✓			

.ot Inspected

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	✓			
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	✓			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?			✓	NO EMERGENCIES

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	✓			
2. Are records of past shipments retained for 3 years?	✓			
(B) Does the owner or operator meet requirements regarding manifest discrepancies?			✓	NO DISCREPANCIES

*Not Inspected

(C) Operating Record

1.	Does the owner or operator maintain an operating record as required in 265.73?	✓		
2.	Does the operating record contain the following information:			
**b.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	✓		
c.	The location and quantity of each hazardous waste within the facility?	✓		
***d.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)		✓	NO DISPOSAL
e.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	✓		
f.	Reports detailing all incidents that required implementation of the Contingency Plan?		✓	NO INCIDENTS
g.	All closure and post closure costs as applicable? (Effective 5-19-81)	✓		

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	✓			
2. Has this plan been submitted to the Regional Administrator			✓	NOT CLOSING
3. Has closure begun?		✓		
4. Is closure estimate available by May 19, 1981?	✓			
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)			✓	NOT APPLICABLE

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: WAUKEGAN/TRAVENOL LABORATORIES Date of Inspection: 5-21-82

	Yes	No	NI*	Remarks
1. Are containers in good condition?	✓			
2. Are containers compatible with waste in them?	✓			
3. Are containers stored closed?	✓			
4. Are containers managed to prevent leaks?	✓			
5. Are containers inspected weekly for leaks and defects?	✓			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)			✓	WASTE IS NON-IGNITABLE AND NON-REACTIVE

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)			✓	Not Applicable
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			✓	Not Applicable

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?				Not Applicable No Tanks
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
3. Do continuous feed systems have a waste-feed cutoff?				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				
5. Are required daily and weekly inspections done?				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				✓

*Not Inspected

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)				NOT APPLICABLE. NO OPEN BURNING
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)				

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: TRAVENOL LABORATORIES

Date of Inspection: 5-21-82

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	✓			
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)			✓	NON-CONTINUOUS FEED SYSTEM.

*Not Inspected

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	✓			
4. Are inspection procedures followed according to 265.403?	✓			
5. Are the special requirements fulfilled for ignitable or reactive wastes?			✓	WASTE is NON-IGNITABLE AND NON-REACTIVE
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)		✓		

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	✓			
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	✓			
2. Name, mailing address, telephone number, and EPA ID Number of Generator	✓			

		Yes	No	NI*	Remarks
3.	Name and EPA ID Number of Transporter(s)?	✓			
4.	Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	✓			
5.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
6.	The total quantity of waste(s) and the type and number of containers loaded?	✓			
7.	Required certification?	✓			
8.	Required signatures?	✓			
(C)	Does the owner or operator submit exception reports when needed?			✓	NO DISCREPANCIES

2. PRE-TRANSPORT REQUIREMENTS

(A)	Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	✓			
(B)	Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	✓			
(C)	If required, are placards available to transporters of hazardous waste?	✓			

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	✓			
(B) Has the generator submitted Annual Reports and Exception Reports as required?			✓	NOT REQUIRED TO DATE

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?		✓		

(If answered Yes, complete the following as applicable.)

	Yes	No	NI*	Remarks
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?			N/A	
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				

*NI - Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

THE TRAVENOL WAUKEGAN FACILITY ACCEPTS 55 gallon drums containing Mynistate oil contaminated with Freon from their Round Lake facility. The Freon/Mynistate oil is generated from the capillary flow dialyzer process. The Freon/Mynistate oil is processed through the Freon distillation unit which recovers much of the Freon. The recovered Freon is reused at the Round Lake facility and the waste still bottoms are placed in 55-gallon drums. The drums containing the still bottoms contaminated with a small percentage of Freon is being accumulated pending on a corporate decision on the type of disposal. According to Ms. Janko the possibilities include incineration and reclamation. There are currently 142 drums in storage.

ILD08 2935067
ILD000661802
Travernal ILD067981125

November 6, 1980

Mr. Raymond T. Murphy
Environmental Counsel
Travernal Laboratories, Inc.
Deerfield, Illinois 60015

Dear Mr. Murphy:

Your letter of October 13, 1980, questioned whether a recycled waste was to be included in the total waste produced at a site for the purpose of determining eligibility for the small quantity generator exemption (40 CFR Part 261.5). The regulations imply that recycled waste is to be counted towards the total amount of waste produced at the site. However, during conversations with EPA headquarters, we were made aware of proposed amendments to the regulations. One amendment states that waste which is hazardous because of its characteristics and is being legitimately reused and recycled is excluded from the quantity of wastes used in determining a small quantity generator. It must be stressed this change becomes effective only when it is published in the Federal Register. Until that time, you are subject to the present regulations.

If you have any further questions please feel free to contact Dr. David Homer of my staff at (312) 886-3790.

Sincerely,

Jay S. Goldstein, Chief
Hazardous Waste Management Section

5AeHWD:JSG:ds/11/6/80

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

prc
PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRC

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

TRAVENOL LABORATORIES, INC.
WAUKEGAN, ILLINOIS
ILD 000 666 180

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 000 666 180
Date Prepared	:	October 31, 1991
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087-IL34
Prepared by	:	Resource Applications, Inc.
Principal Investigator	:	William J. Dytrych, Ph.D.
Telephone No.	:	(312) 332-2230
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

TABLE OF CONTENTS

LIST OF ATTACHMENTS

LIST OF TABLES

LIST OF FIGURES

EXECUTIVE SUMMARY

Resource Applications, Inc. (RAI), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Travenol Laboratories, Inc. (Travenol) warehouse facility in Waukegan, Illinois. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

Travenol Laboratories, Inc. (Travenol), now known as Baxter Healthcare Corporation, is a manufacturer of chemicals and allied products, rubber, miscellaneous plastic products, and surgical and medical instruments and apparatus. The Waukegan facility is an approximately 10-acre warehouse supporting manufacturing processes at other Baxter plants. It began operation on November 1, 1976. Until 1984, waste Myristate oil contaminated with Freon 113 (F002) and miscellaneous spent solvents (F001) were brought from Travenol's facility at Route 120 and Wilson Road, Round Lake, Illinois for distillation in the Former Freon Recovery Still (SWMU 2). Information regarding the specific spent solvent types was not made available to RAI. The only waste stream generated was the still bottoms, which were transported off-site for disposal. All wastes were stored on pallets on the concrete floor of the Former Indoor Drum Storage Areas (SWMU 1). In July 1984 the still was moved to the Round Lake facility, and by September 1985 all drums had been removed and there was no longer any hazardous waste activity at the site. All the previous storage and distillation areas are considered closed by IEPA. The facility is currently used solely as a warehouse. There is no record of any corrective action at the facility.

The PA/VSI identified the following 2 SWMUs at the facility:

Solid Waste Management Units

1. Former Indoor Drum Storage Areas
2. Former Freon Recovery Still

No Areas of Concern were identified during the PA/VSI.

There have been no documented releases to the environment from either of the SWMUs. As the facility no longer handles hazardous substances, the current potential for a SWMU to release hazardous constituents to ground water, surface water, air or soil is non-existent. In the past the Former Indoor Drum Storage Areas (SWMU 1) and the Former Freon Recovery Still (SWMU 2) were located indoors on a concrete floor. Thus the past potential for release to ground water, surface water, air or soil was low.

Waukegan is served by a municipal water system whose source is Lake Michigan. Consequently, the community is not dependent upon water from ground water wells. There is an area of marshlands about 1/2 mile downgradient to the northwest of Travenol, and the Des Plaines River is about 1 mile to the west of the facility. The nearest residences are a half-mile away to the southeast. Access to the facility is unrestricted, other than that the warehouse is locked during non-business hours.

No further action is recommended at the facility.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 Team member, provided the necessary assistance to complete the PA/VSI activities for Travenol Laboratories, Inc. (Travenol).

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Travenol Laboratories, Inc. (Travenol) facility (ILD 000 666 180) in Waukegan, Illinois. The PA was completed on April 22, 1991. RAI gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. RAI also reviewed documents from the U.S. Department of Agriculture (USDA), U.S. Geological Survey (USGS), Federal Emergency Management Agency (FEMA) and the Illinois State Geological Survey (ISGS). Information was also obtained from the Lake County Department of Health (LCDH).

The VSI was conducted on April 23, 1991. It included interviews with Travenol facility representatives and a walk-through inspection of the facility. Two SWMUs and no AOCs were identified at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 4 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

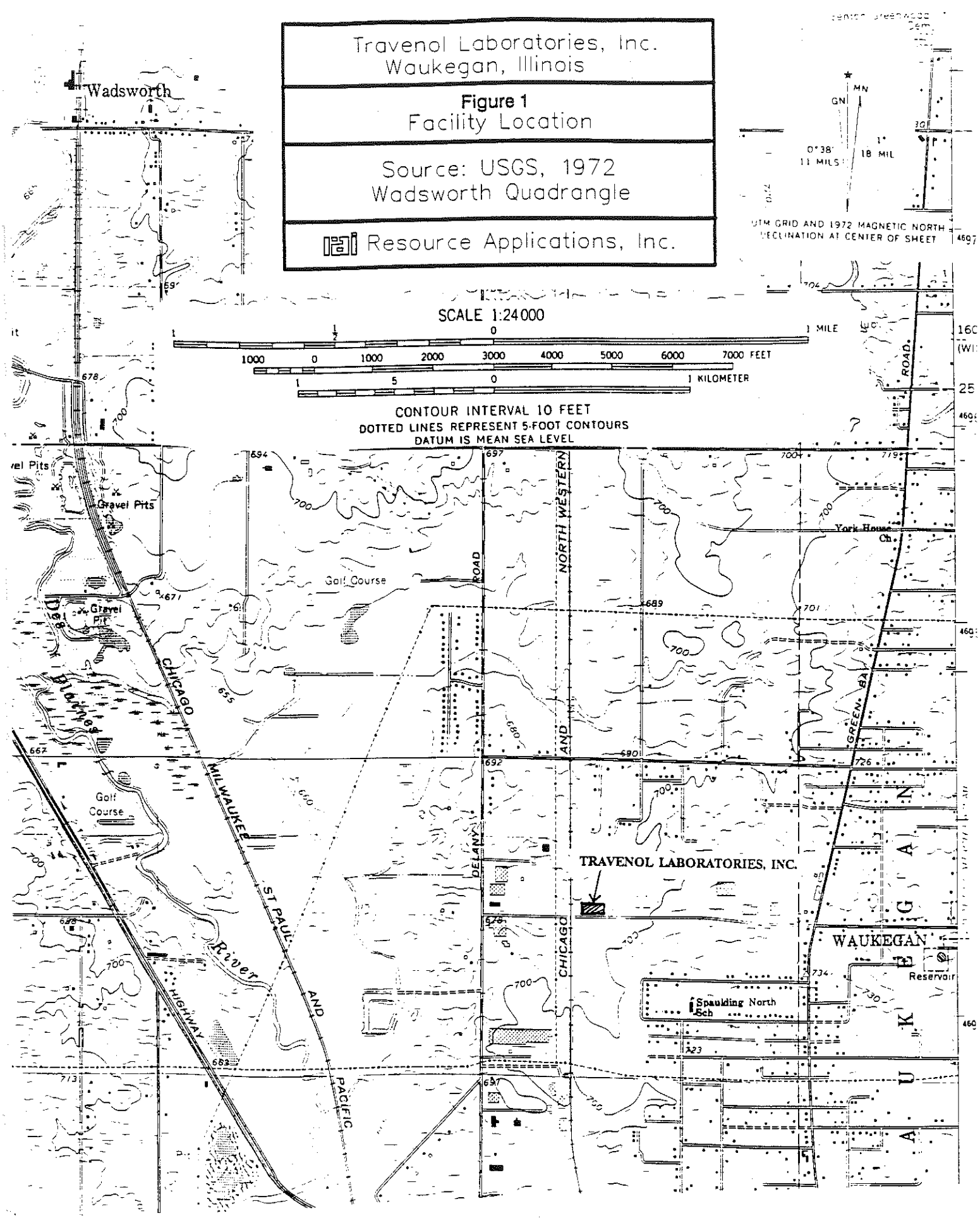
The Travenol facility is located at 3860 Sunset Avenue, Waukegan, Illinois, in Lake County (Figure 1). The facility is situated in a light industrial/residential area on the northwestern edge of the city of Waukegan, on the northwest corner of the junction between Sunset and Northwestern Avenues. The site occupies about 10 acres, and is accessed from Northwestern Avenue.

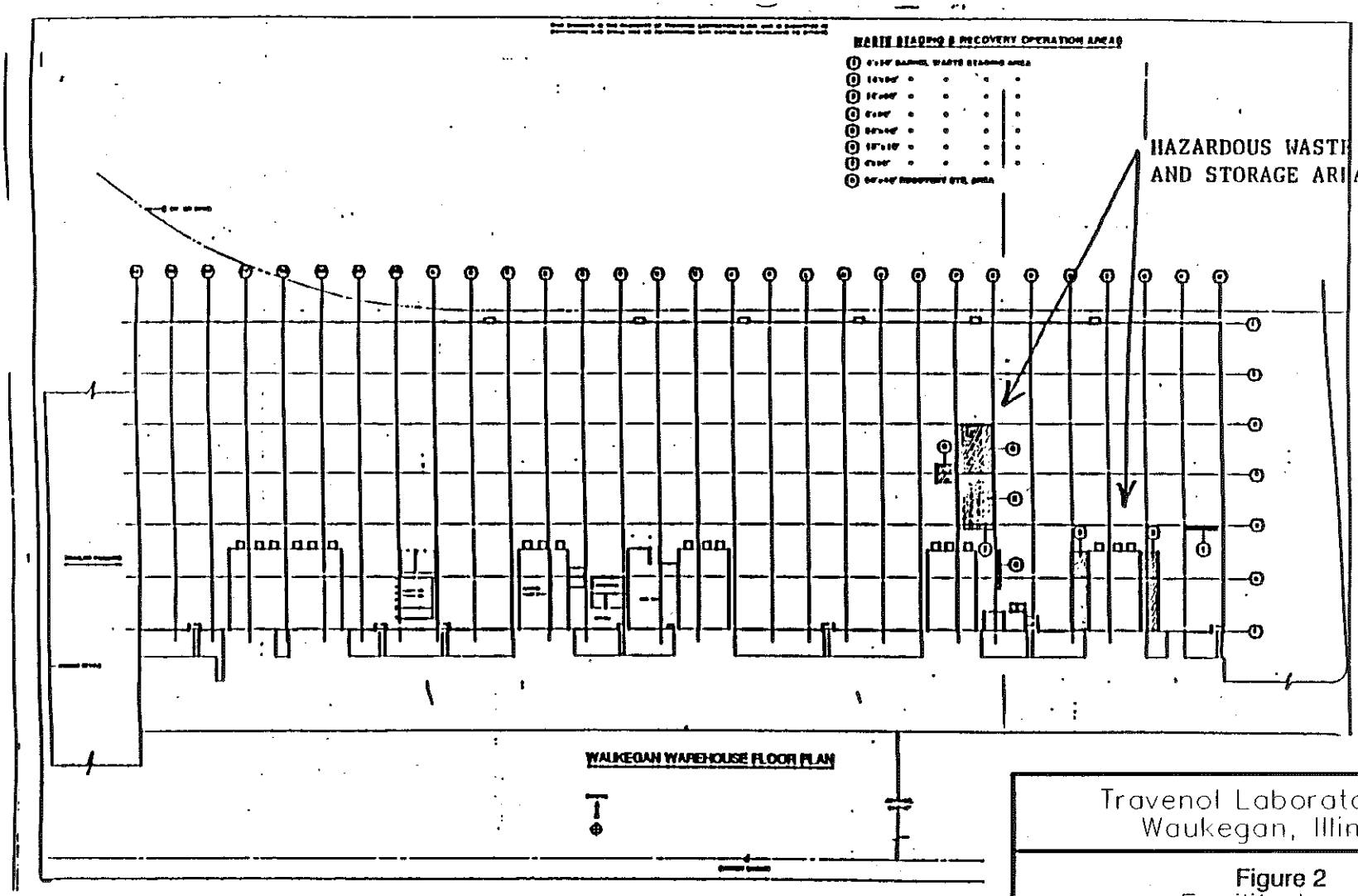
2.2 FACILITY OPERATIONS

Travenol Laboratories, Inc. (Travenol) is a manufacturer of chemicals and allied products, rubber, miscellaneous plastic products, and surgical and medical instruments and apparatus. Travenol was a subsidiary of Baxter-Travenol Laboratories, Inc. In November 1985, Baxter-Travenol acquired American Hospital Supply, and in July 1987 the enlarged company officially changed its name to Baxter Healthcare Corporation (Travenol, 1987). Baxter Healthcare is a subsidiary of Baxter International Inc. Throughout this report, reference will be made solely to Travenol, as the majority of correspondence and inspections took place prior to the name change.

The facility is a warehouse supporting manufacturing processes at other Baxter plants (Figures 2 and 3). In the past it has also served as a storage area for 55-gallon drums of hazardous wastes; until 1984, contaminated Freon 113 from manufacturing processes was distilled at this site. The facility began operation on November 1, 1976. The building has been leased from Talisen Management since late 1988, and Travenol occupies about three-quarters of the building. There are currently 11 employees at the facility; in the past this number has fluctuated between 10 and 20.

Wastes were brought to the facility from Travenol's facility at Route 120 and Wilson Road, Round Lake, Illinois (the "Round Lake facility"). The predominant waste type was Myristate oil contaminated with Freon 113 (F002). In addition, miscellaneous spent solvents (F001) and still bottoms from solvent distillation processes were handled. Information regarding specific spent solvent types was not made available to RAI. Until 1984, the Freon 113 was distilled on-site in the Former Freon


Travenol Laboratories, Inc.
Waukegan, Illinois
Figure 1
Facility Location
Source: USGS, 1972
Wadsworth Quadrangle
Resource Applications, Inc.
Wadsworth
GN
MN
0°38'
11 MILS
1°
18 MIL
UTM GRID AND 1972 MAGNETIC NORTH
DECLINATION AT CENTER OF SHEET
SCALE 1:24000
1 MILE
1000 0 1000 2000 3000 4000 5000 6000 7000 FEET
1 KILOMETER
CONTOUR INTERVAL 10 FEET
DOTTED LINES REPRESENT 5-FOOT CONTOURS
DATUM IS MEAN SEA LEVEL
Gravel Pits
Golf Course
Gravel Pit
Golf Course
York House Ch.
NORTH WESTERN ROAD AND CHICAGO
GREEN BAY
MILWAUKEE ST PAUL AND PACIFIC
DELANY
CHICAGO
HIGHWAY
River
TRAVENOL LABORATORIES, INC.
WAUKEGAN
Reservoir
Spaulding North Sch
ROAD

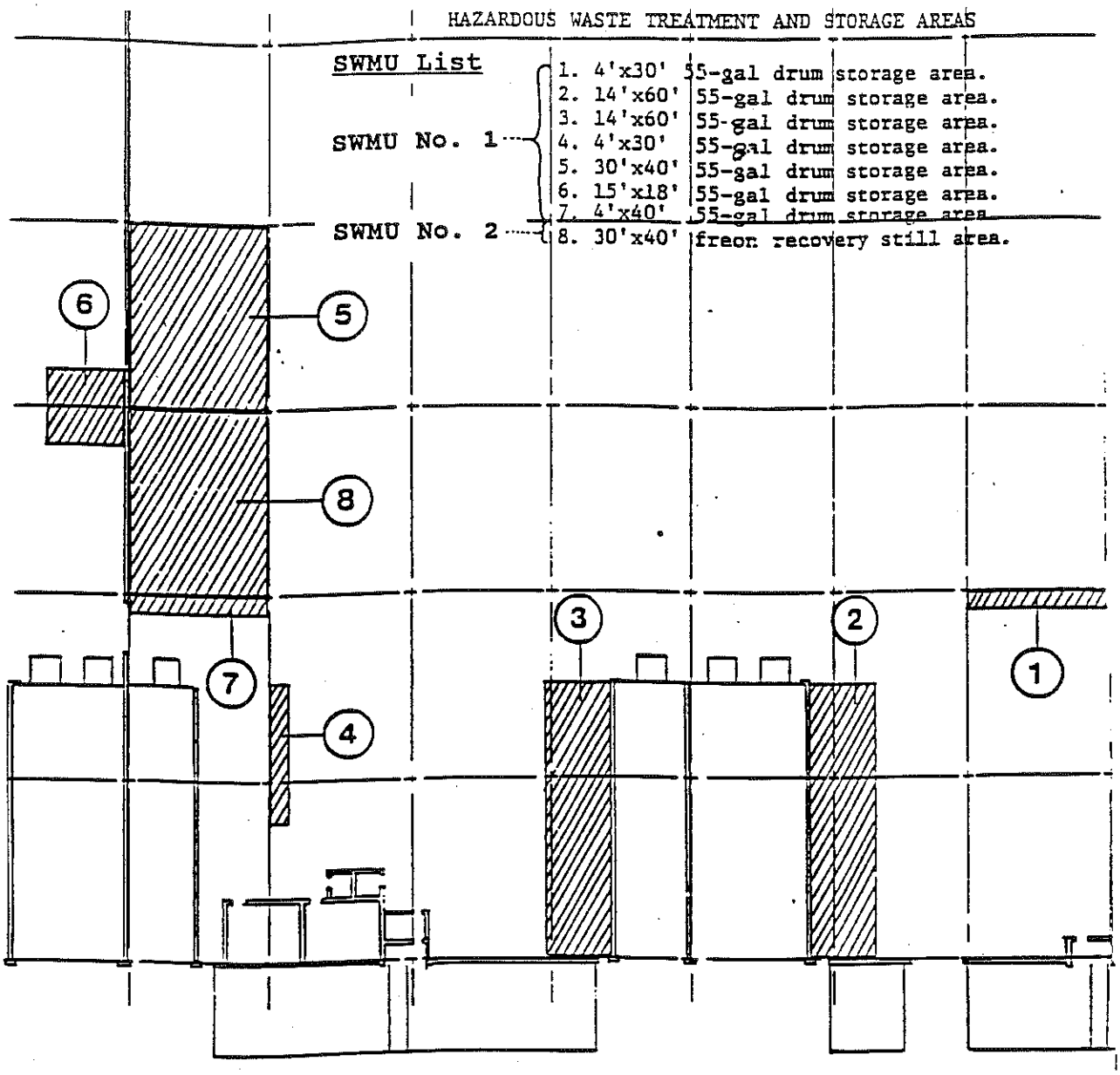


COPY REDUCTION ; SCALE APPROXIMATELY 1" = 128'

Travenol Laboratories, Inc. Waukegan, Illinois
Figure 2 Facility Layout
Approximate Scale: 1" = 128' Source: Travenol, 1980b
Resource Applications, Inc

FIGURE 3

DETAIL OF FACILITY LAYOUT / SWMU MAP



DETAILED DRAWING
HAZARDOUS WASTE TREATMENT
AND STORAGE AREAS
WAUKEGAN WAREHOUSE
TRAVENOL LABORATORIES, INC.

N

Travenol Laboratories, Inc. Waukegan, Illinois
Figure 3 Detail of Facility Layout/SWMU Map
Approximate Scale: 1" = 36' Source: Travenol, 1980b
Resource Applications, Inc.

Recovery Still (SWMU 2) and then reused. Approximately 70 percent by volume of solvent waste was reclaimed by this method and the remaining 30 percent being still bottoms, was disposed of off-site. The distilled Freon 113 was checked for specifications and then either redistilled, sent to Custom Organics in Chicago for reclaiming, or sold to McKesson or Safety-Kleen as product. The Former Freon Recovery Still (SWMU 2) was relocated to the Round Lake facility in July 1984 (Travenol, 1984) and in 1986 the Former Indoor Drum Storage Areas (SWMU 1), as well as the area previously occupied by the still, were closed in accordance with the approved closure plan (IEPA, 1986). Since that time, the facility has been used solely as a warehouse; no hazardous waste activity has taken place. Non-hazardous waste, mostly consisting of cardboard and shrink-wrap plastic is removed and disposed of about once a week by Jensen Disposal.

Table 1 lists the Travenol facility's Solid Waste Management Units (SWMUs).

2.3 WASTE GENERATING PROCESSES

Myristate Oil contaminated with Freon 113 (F002) was produced by the capillary flow dialyzer process at Travenol's facility in Round Lake, Illinois (ILD 067 989 723). This waste was placed in 55-gallon drums and transported to this facility. Here the drums were stacked on wooden pallets indoors on a concrete floor with no drain. Until 1984, this waste was distilled in the Former Freon Recovery Still (SWMU 2). The starting date for distillation and storage of hazardous wastes is not clear, but was somewhere between November 1976, the commencement of operations at the facility, and November 1980, the time of submission of the Part A application. The resulting still bottoms were drummed and later transported off-site for disposal. At the time of an IEPA inspection in 1982, 142 drums of still bottoms were in storage pending a corporate decision on the type of disposal to be used, which would be either incineration or reclamation. According to Greg Janko, Plant Manager, for every 20 drums of waste, 14 drums of Freon were reclaimed, and 6 drums of still bottoms were disposed of (IEPA, 1982a). In addition, a maximum of 5,500 gallons of unspecified "spent solvents" was handled at any one time, as indicated by the closure plan (Travenol, 1985a). In November, 1980 a one-time generation of 23 tons of a prepolymer (classified as D001 waste) was stored until its disposal in 1981. Table 2 lists the solid wastes managed at the facility.

These four groups are the only wastes that have been handled at the facility. At the time of a September 1985 inspection, the building was being used solely as a warehouse, all wastes having been removed (IEPA, 1985b). Thus there has been no hazardous waste activity at the facility since that time.

TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Former Indoor Drum Storage Areas	Yes	Closed since 1985; RCRA closure completed 1986.
2	Former Freon Recovery Still	No	This unit was moved to Round Lake facility in July 1984. RCRA closure completed 1986.

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit
Myristate oil contaminated with Freon 113/F002	Travenol Round Lake facility	SWMUs 1 & 2
Waste oil/Freon 113 still bottoms/F002	Former Freon Distillation Unit (SWMU 2)	SWMU 1
Spent Solvents/F001	Off-site	SWMUs 1 & 2
Prepolymer/D001	Off-site	SWMU 1

Non-hazardous waste, which mostly consists of cardboard and shrink-wrap plastic, is removed about once a week by Jensen Disposal.

2.4 RELEASE HISTORY

In a July 29, 1985 letter to IEPA, Richard Heizer of Travenol states that "...There has never been a spill or drum leak at this location that was not contained in the immediate vicinity and thoroughly cleaned up immediately" (Travenol, 1985a). From this statement, it appears that there may have been releases in the past, but they did not present any threat to the environment. No evidence of any release was found during the VSI, and there are no documented releases to the environment at this facility.

2.5 REGULATORY HISTORY

Travenol filed a Notification of Hazardous Waste Activity on August 15, 1980 (Travenol, 1980a) and a Part A permit application on October 21, 1980 (Travenol, 1980b). 31,000 gallons of container storage (S01) and a distillation unit (T04) with a capacity of 912 gallons per day were registered in the application, handling wastes with codes F001, F002 and D001. On March 2, 1981, Travenol requested deletion of references to "treatment" in its Part A application, because according to 40 CFR Part 261.6, the facility only needed to be regulated as a storage facility (Travenol, 1981). In June 1981 Travenol was granted a permit by IEPA to transport and receive 14,000 gallons of spent Freon 113 from the Travenol Round Lake facility (EPA ID# ILD 067 989 723). This permit was in effect for about a year (IEPA, 1981). It is assumed that the permit was renewed for as long as the facility was handling such wastes, but no correspondence exists in the EPA Region 5 or IEPA files that would verify this.

An inspection of the facility was conducted on May 21, 1982 by Dan Shane and Chuck Gruntman of IEPA (IEPA, 1982a) Subsequently, Travenol was informed that it was in full compliance with RCRA regulations (IEPA, 1982b). On April 4, 1981, a closure plan for the storage areas was first submitted. This was found to be deficient by IEPA, and was revised six times before its final submission on July 29, 1985 (Travenol, 1985a) and subsequent approval on September 16, 1985 (IEPA, 1985a). On April 15, 1985, Ray Murphy of Travenol informed IEPA that the facility was no longer being used for hazardous waste management (Travenol, 1985b). This was verified by Brad Benning of IEPA, who conducted a Treatment Storage and Disposal Facility inspection on September 17, 1985. He found that there was no longer any hazardous waste activity on site and that closure activities were in progress (IEPA, 1985b). A closure inspection on January 29, 1986 found that closure activities had been

completed in accordance with the approved closure plan (IEPA, 1986). The closure was certified by Clement A. Vath, P.E. of ERM-North Central, Inc. (ERM, 1986).

There are no records regarding NPDES permits or CERCLA activity at the facility. On the Part A Permit Application, a state air emission permit (Number 09050004) is mentioned. However, an inquiry to IEPA regarding air permits indicated that there was no air permit file for the facility (IEPA, 1991). RAI was unable to obtain any further air permit information from Travenol.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Travenol facility.

2.6.1 Climate

The Travenol site is approximately three miles north of the National Weather Service substation in Waukegan. With no significant topographical barriers to airmass flow, the climate in the area is typically continental with cold winters; warm summers; and frequent short-period fluctuations in temperature, humidity, cloudiness, and wind direction (Ruffner, 1985). The average annual daily temperature is 47.6°F. Over the period 1951 to 1980, the lowest average monthly minimum temperature of 20.2°F has occurred in January, and the highest average monthly maximum temperature of 71.5°F has occurred in July. The prevailing winds are westerly, and the average annual precipitation, as water equivalent, is 33.65 inches. The average annual net precipitation is 4.65 inches (USDC, 1968). In winter, about one-half of the precipitation (15 percent of the annual total) falls as snow. During the fall, winter, and spring, the pattern of precipitation tends to be more uniform over both time and distance, whereas in summer, rainfall is often locally heavy and variable (Ruffner, 1985). The 1-year 24-hour maximum rainfall recorded over the period 1951 to 1980 is 4.0 inches (Ruffner, 1985).

2.6.2 Flood Plain and Surface Water

The facility, at an approximate elevation of 695 feet, is situated on the eastern slope of the Des Plaines River Valley one mile east-northeast of the river at its closest point (USGS, 1972). The site locale is classified as a Zone C flood plain area, that is, an area of minimal flooding outside the 500-year flood plain (FEMA, 1981).

2.6.3 Geology and Soil

Surface deposits and features in the Waukegan area are largely the result of glaciation and almost completely cover the underlying bedrock surface (Willman, 1971). The facility is underlain by two soil units -- the Grays and Markham silt loams, 2 to 4 percent slopes, and the Mundelein and Elliott silt loams on 0 to 2 percent slopes. Both units are intermorainal soils. The Grays and Markham unit is a deep, gently sloping, moderately well-drained soil that formed in 2 to 3 feet of silty material and the underlying calcareous, stratified silt and sand. These soils occur in uplands and have moderate to moderately slow permeability, a high available moisture capacity, and a water table that is generally at least 3 feet below the surface. The Mundelein and Elliott unit is a deep level, somewhat poorly drained soil that consists of 2 to 3 feet of silty material over calcareous, stratified silt and sand. Occurring in upland areas, this soil unit has a moderate to moderately slow permeability, high available moisture capacity, and a water table that is generally 1 to 3 feet below the surface in spring (USDA, 1970).

Soils in the Waukegan area have developed over the past 13,500 years through the weathering of the immediately underlying glacial deposits left behind, for the most part, by retreating Wisconsin-age glaciers. In the vicinity of the site, the glacial deposits consist mostly of gray, clayey till containing pebble and smaller-sized black shale particles. Approximately 195 feet of till overlie the uppermost consolidated bedrock unit which is a dolomite of Silurian age. In the Waukegan area, this dolomite ranges in composition from extremely argillaceous, silty and cherty to exceptionally pure, and in the vicinity of the site is approximately 200 feet thick. Beneath the Silurian dolomite are successively older rocks of Ordovician and Cambrian age. Within each of these two systems are distinctive sandstone formations which serve as major aquifer systems in the Chicagoland area. The base of the Cambrian is in contact with the pre-Cambrian basement at an inferred depth of 3,300 feet (Willman, 1971).

2.6.4 Ground Water

Ground water is obtained from four major aquifer systems in northeastern Illinois -- the glacial drift system, the shallow bedrock system, and two deep bedrock systems. They are distinguished by their hydrologic properties and recharge source areas (Hughes et al., 1966). In northeastern Lake County, possibilities are fair to good for the occurrence of water-bearing sand and gravel within the glacial drift. However, the localized nature of such deposits requires extensive testing to locate them, and, when found, their wells are likely to have a yield capable of satisfying only domestic or farm requirements. Typical well depths are 35 to 100 feet (Bergstrom et al., 1955). The shallow bedrock aquifer system in

the site vicinity underlies the glacial drift system and is comprised of the Silurian dolomite formations and underlying upper Ordovician shales. The upper boundary of this system is the bedrock-drift contact, and the lower boundary is the top of a sequence of formations of middle Ordovician age called the Galena-Platteville Dolomite. Water from this aquifer is obtained from fractures and solution openings in the Silurian dolomite beds (Hughes et al., 1966). The site is located in a transition zone between an area that extends east to Lake Michigan in which the dolomite is poorly creviced and as a sequence has a less-than-average water-yielding potential, and an area to the west in which water-yielding cracks can satisfy industrial and municipal demands (Bergstrom et al., 1955). Recharge is attained by percolation of local precipitation through the overlying glacial drift and/or permeable materials within the drift sequence itself (Hughes et al., 1966).

The deep bedrock aquifer systems include the Cambrian-Ordovician aquifer system and the Mt. Simon aquifer system. The former comprises the Glenwood and St. Peter Formations of the middle Ordovician series and the Ironton and Galesville Sandstone formations of the late Cambrian. The top of the Cambrian-Ordovician aquifer is at the top of or within the Galena-Platteville Dolomite, which serves as the lower boundary for the shallow bedrock aquifer system. In the site locale, the contact between the Galena-Platteville Group formations and the Glenwood Formation occurs at a depth of about 845 feet below the ground surface (Hughes et al., 1966). The bottom of the Cambrian-Ordovician aquifer system is located in the impermeable shales and dolomites of the upper and middle parts of the Cambrian Eau Claire Formation, at a depth of about 1,350 feet below the ground surface; thus, this aquifer system spans a thickness of approximately 500 feet (Hughes et al., 1966).

Within the Cambrian-Ordovician aquifer system, the Glenwood-St. Peter Sandstone unit is widely utilized as an aquifer where water requirements are less than 200 gallons per minute (gpm). This unit has a permeability of approximately 15 gallons per day per square foot (gpd/sq.ft.). The Ironton-Galesville Sandstone unit is the major producing unit in the Cambrian-Ordovician aquifer because it has the most consistent permeability (35 gpd/sq.ft.) and thickness (200 ft.) of the aquifers in northeastern Illinois (Hughes et al., 1966).

Recharge to the Cambrian-Ordovician aquifer system is mostly from western McHenry, Kane and Kendall Counties where the rocks crop out at the surface or lie immediately below the glacial drift. Additional recharge occurs directly from leakage of precipitation downward through the shallow bedrock system (Hughes et al., 1966).

The second deep bedrock aquifer system -- the Mt. Simon aquifer -- is bounded above by the relatively impermeable shales and dolomites of the upper and middle parts of the Eau Claire Formation and below by the crystalline Pre-Cambrian basement. With the Eau Claire Formation units functioning as an aquitard, water in the Mt. Simon aquifer occurs under leaky artesian conditions. In the vicinity of the site, the top of the Mt. Simon sandstone is about 1,650 feet beneath the ground surface.

Although the Mt. Simon sandstone is nearly 1,700 feet thick, only the uppermost 275 feet yield potable water because below that depth the water is too highly mineralized for most purposes (Hughes et al., 1966). The average permeability of the Mt. Simon aquifer system is approximately 16 gpd/sq.ft. (Hughes et al., 1966) and recharge is largely from the outcrop region of Cambrian rocks in central southern Wisconsin (Willman, 1971).

2.7 RECEPTORS

The Travenol facility is located in a residential/industrial area on the northwestern fringes of Waukegan, Illinois. The facility is bordered by Sunset Avenue to the south and Northwestern Avenue to the east. Access to the facility is not restricted, other than that the warehouse is locked during non-business hours. All hazardous wastes were stored inside the building. The general topography in the vicinity of the site slopes down to the northwest, towards the floor of the Des Plaines River valley. The City of Waukegan derives it water supply form Lake Michigan; consequently the community is not dependent upon ground water wells. There are, however, 3 private wells within the Section and Township of the facility; they are all to the east (i.e. upgradient) of the site. Two are into sand at depths of 90 and 92 feet and the other is 228 feet deep and into gravel (LCDH, 1991).

There is an area of marshlands about a 1/2 mile northwest of the site, and the Des Plaines River is about 1 mile to the west of the facility. The nearest residential area, part of Waukegan, is a half-mile to the southwest of the site. The City of Waukegan has a population of approximately 70,000.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 2 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of release, and RAI observations.

SWMU 1 — **Former Indoor Drum Storage Areas**

Unit Description: This SWMU consists of 7 areas of the southwest corner of the warehouse which were used for the storage of 55-gallon drums of waste. All these areas are within one open space of warehouse floor, and are of varying dimensions, and are illustrated in Figure 3 and Photos 2, 3 and 4.

Date of Startup: The exact dates of startup are unknown, but the dates were somewhere between November 1, 1976 (the date of commencement of operations at the facility) and August 1980, when the Notification of Hazardous Waste Activity was filed.

Date of Closure: These areas were closed in accordance with the IEPA-approved closure plan on January 30, 1986. The floors were mopped using a cleaning solution, and rinsed thoroughly. Analysis of the washwater found no significant levels of hazardous constituents.

Wastes Managed:
Myristate oil contaminated with Freon 113 (F002)
Oil/Freon 113 still bottoms (F002)
Spent Solvents (F001)
Prepolymer (D001)

Release Controls: There was no secondary containment. According to Richard Heizer of Travenol, none was necessary due to the high volatility of Freon 113. (Travenol, 1985a). Any release to air due to volatilization would most likely be contained within the building with no significant release to the environment. There is no floor drain. According to Travenol,

absorbents were kept on hand in case of a spill. The floor is in good condition, with no visible cracks.

History of Release: There is no record of any release from this unit, other then minor releases from the drums alluded to by Richard Heizer (Travenol, 1985a) and discussed in Section 2.4.

Observations: These areas are now used for warehouse storage. It is in good physical condition, and there is no evidence of any release of hazardous constituents.

SWMU 2 **Former Freon Recovery Still**

Unit Description: This is a Custom Model CRS-40C-WR Solvent Recovery Still, manufactured by Crest Ultrasonics Corp. It was used to recover Freon 113 from Freon 113/Myristate oil mixtures, and to distill spent solvents. It was located inside in the warehouse, as indicated on Figure 3. The still had a capacity of 912 gallons per day, as indicated on the Part A Permit Application (Travenol, 1980b).

Date of Startup: The exact date of startup is unknown, but the dates were somewhere between November 1, 1976 (the date of commencement of operations at the facility) and August 1980, when the Notification of Hazardous Waste Activity was filed.

Date of Closure: This unit was moved to Travenol's Round Lake facility in July, 1984. The area previously occupied by the still was considered closed in accordance with the approved closure plan on January 30, 1986 (IEPA, 1986). The floor was mopped using a cleaning solution, and rinsed thoroughly. Analysis of the washwater found no significant levels of hazardous constituents.

Wastes Managed: Myristate oil contaminated with Freon 113 (F002)
Oil/Freon 113 still bottoms (F002)
Spent Solvents (F001)

Release Controls:	There was no secondary containment. There was a floor drain in the area of the still, which was used for the discharge of non-contact cooling water from the still to the sanitary sewer system. According to Travenol, absorbents were kept on hand in case of a spill. The floor drain was filled in with concrete after the still was removed.
History of Release:	There is no record of any releases from this area.
Observations:	This area is now used for warehouse storage (Photo 1). It is in good physical condition, and there is no evidence of any release of hazardous constituents.

4.0 AREAS OF CONCERN

RAI identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 2 SWMUs and no AOCs at the Travenol facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU and AOC. Table 3 identifies the SWMUs and AOCs at the Travenol facility and suggested further actions.

SWMU 1 **Former Indoor Drum Storage Areas**

Conclusions: These areas were used to store 55-gallon drums of Freon 113 and oil wastes (F002), as well as unspecified solvents (F001). These storage areas were closed in accordance with the approved closure plan. There is no longer any activity involving hazardous materials at the facility. Therefore, the current potential for release from this SWMU to ground water, surface water, air or soil is non-existent. In the past the drums were stored indoors on a sound concrete floor with no drain. The past potential for release to ground water, surface water, air or soil was low. Freon 113 is volatile and in the event of a spill would most likely have evaporated or have been contained within the warehouse. Any air release due to volatilization would have been mostly contained within the building and therefore the threat of release to the environment was minimal.

Recommendations: No further action is recommended at this time.

SWMU 2 **Former Freon Recovery Still**

Conclusions: This still was used to distill Myristate oil/Freon 113 mixtures (F002) as well as spent solvents (F001). It was removed from the facility in July 1984 and the SWMU was closed in accordance with the approved closure plan in 1986. There is no longer any activity involving hazardous materials at the facility. Therefore, the current potential for release from this SWMU to ground water, surface water, air or soil is non-existent. In the past the still was located

TABLE 3

SWMU AND AOC SUMMARY

SWMU	Operational Dates	Evidence of Release	Suggested Further Action
1. Former Indoor Drum Storage Areas	Unknown to 1986	Possible minor releases from drums but not to the environment.	No further action is recommended at this time.
2. Former Freon Recovery Still	Unknown to 1984	Possible minor releases, but not to the environment.	No further action is recommended at this time.

indoors on a sound concrete floor; thus the past potential for release to ground water, surface water,air or soil was low.

Recommendations: No further action is recommended at this time

6/15/00

ENFORCEMENT CONFIDENTIAL

REFERENCES

Bergstrom, R.E., J.W. Foster, L.F. Selkregg and W.A. Pryor, 1955. "Groundwater possibilities in Northeastern Illinois". Illinois State Geological Survey Circular 198; Urbana, Illinois.

ERM-North Central (ERM), 1986. Certification of Closure for Travenol Waukegan facility, signed by Clement A. Vath, received by IEPA January 14.

Federal Emergency Management Agency (FEMA), 1981. National Flood Insurance Program, City of Waukegan, Illinois, Lake County. Community panel number: 170397 0003 B. Effective date: June 15, 1981.

Hughes, G.M., P. Kraatz and A. Landon, 1966. "Bedrock Aquifers of Northeastern Illinois". Illinois State Geological Survey Circular 406. Urbana, Illinois.

Illinois Environmental Protection Agency (IEPA), 1981. Permit to receive Freon 113 waste issued to Travenol Laboratories, Waukegan, June 3.

IEPA, 1982a. Treatment, Storage and Disposal Facility Inspection report, May 21.

IEPA, 1982b. Letter to Gregory Janko, Travenol from Kenneth P. Bechely, August 26.

IEPA, 1985a. Letter to Raymond Murphy of Travenol from Lawrence Eastep approving closure plan, September 16.

IEPA, 1985b. Treatment, Storage and Disposal Facility Inspection Report, September 17.

IEPA, 1986. Internal Memorandum to Permit Section from Brad Benning regarding Closure Inspection, January 29.

IEPA, 1991. Letter to William Dytrych of Resource Applications, Inc. regarding Freedom of Information Act request, March 8.

Lake County Department of Health (LCDH), 1991. Telephone conversation between Alan Supple, RAI and Dennis De Bennett, Engineering Section, regarding ground water wells, August 22.

Ruffner, J.A., 1985. Climates of the States (3rd Edition); Volume 1: Alabama - New Mexico. Gale Research Company, Detroit, Michigan.

Travenol Laboratories, Inc. (Travenol), 1980a. Notification of Hazardous Waste Activity, August 15.

Travenol, 1980b. Part A Permit Application, October 21.

Travenol, 1981. Letter to EPA from Raymond T. Murphy, March 2.

Travenol, 1984. Letter to IEPA Air Permit Division from Raymond T. Murphy, July 27.

Travenol, 1985a. Letter to Lawrence Eastep, IEPA from Richard Heizer enclosing revised closure plan, July 29.

Travenol, 1985b. Letter to IEPA Division of Land Pollution Control from Raymond Murphy, April 15.

Travenol, 1987. Letter to William Child, IEPA from P.S. Bartholemew regarding name change to Baxter Healthcare, November 4.

United States Department of Agriculture Soil Conservation Service (USDA), 1970. "Soil Survey of Lake County, Illinois. Illinois Agricultural Experiment Station Soil Report 88, U.S. Government Printing Office, Washington, D.C.

United States Department of Commerce (USDC), 1968. Climatic Atlas of the United States. U.S. Printing Office, Washington, D.C.

United States Geological Survey (USGS), 1972. Wadsworth Quadrangle, Illinois-Wisconsin (Lake/Kenosha Counties). 7.5 Minute Series (Topographic).

Willman, H.B., 1971. "Summary of the Geology of the Chicago Area". Illinois State Geological Survey Circular 460; Urbana, Illinois.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 000 666 180

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER				
Travenol Laboratories, Inc.	3860 Sunset Avenue				
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 COUNTY**	**07 COUNTY CODE**	**08 CONG DIST**
Waukegan	IL	60085	Lake		

09 COORDINATES: LATITUDE 42 23 17.N | LONGITUDE 087 53 44.W

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

The site is located on the north side of Sunset Avenue, to the west of the junction with Northwestern Avenue. Entrance to the site is from Northwestern Avenue.

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
The Prudential Insurance Company of America	Prudential Plaza, Suite 3300		
03 CITY	**04 STATE**	**05 ZIP CODE**	**06 TELEPHONE NUMBER**
Chicago	IL	60601	(312) 861-4823
07 OPERATOR *(if known and different from owner)*	**08 STREET** *(Business, mailing, residential)*		
Baxter Healthcare Corp.	1 Baxter Parkway		
09 CITY	**10 STATE**	**11 ZIP CODE**	**12 TELEPHONE NUMBER**
Deerfield	IL	60015	(708) 948-2000

13 TYPE OF OWNERSHIP *(Check one)*

■ A. PRIVATE □ B. FEDERAL: _____ *(Agency name)* □ C. STATE □ D. COUNTY □ E. MUNICIPAL

□ F. OTHER _____ *(Specify)* □ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

■ A. RCRA 3010 DATE RECEIVED: 08 / 15 / 80 (MONTH DAY YEAR) □ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: / / (MONTH DAY YEAR) □ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

■ YES DATE 04 /23 /91
□ NO

BY *(Check all that apply)*

□ A. EPA ■ B. EPA CONTRACTOR □ C. STATE □ D. OTHER CONTRACTOR
□ E. LOCAL HEALTH OFFICIAL □ F. OTHER: _____ *(Specify)*

CONTRACTOR NAME(S): Resource Applications, Inc.

02 SITE STATUS *(Check one)*

■ A. ACTIVE □ B. INACTIVE □ C. UNKNOWN

03 YEARS OF OPERATION

1976 (BEGINNING YEAR) 1985 (ENDING YEAR) □ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

No hazardous substances are present at the site; there is no longer any hazardous waste activity.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

None.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

□ A. HIGH *(Inspection required promptly)* □ B. MEDIUM *(Inspection required)* □ C. LOW *(Inspect on time-available basis)* ■ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	**05 AGENCY**	**06 ORGANIZATION**	**07 TELEPHONE NUMBER**	**08 DATE**
William Dytrych		Resource Applications, Inc.	(312) 332-2230	09 / 06 / 91 (MONTH DAY YEAR)

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 000 666 180

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*

- ☐ A. SOLID
- ☐ B. POWDER, FINES
- ☐ C. SLUDGE
- ☐ D. OTHER _____ *(Specify)*
- ☐ E. SLURRY
- ☐ F. LIQUID
- ☐ G. GAS

02 WASTE QUANTITY AT SITE *(Measures of waste quantities must be independent)*

TON _____

CUBIC YARDS _____

NO. OF DRUMS _____

03 WASTE CHARACTERISTICS *(Check all that apply)*

- ☐ A. TOXIC
- ☐ B. CORROSIVE
- ☐ C. RADIOACTIVE
- ☐ D. PERSISTENT
- ☐ E. SOLUBLE
- ☐ F. INFECTIOUS
- ☐ G. FLAMMABLE
- ☐ H. IGNITABLE
- ☐ I. HIGHLY VOLATILE
- ☐ J. EXPLOSIVE
- ☐ K. REACTIVE
- ☐ L. INCOMPATIBLE
- ☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE	NONE		No hazardous waste activity has taken place at the site since 1985.
OLW	OILY WASTE	NONE		
SOL	SOLVENTS	NONE		
PSD	PESTICIDES	NONE		
OCC	OTHER ORGANIC CHEMICALS	NONE		
IOC	INORGANIC CHEMICALS	NONE		
ACD	ACIDS	NONE		
BAS	BASES	NONE		
MES	HEAVY METALS	NONE		

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

Illinois Environmental Protection Agency (IEPA), 1986. Closure Inspection Report, January 29.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
IL	ILD 000 666 180

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ B. SURFACE WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ C. CONTAMINATION OF AIR — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ E. DIRECT CONTACT — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ F. CONTAMINATION OF SOIL — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 AREA POTENTIALLY AFFECTED: _____ *(Acres)*

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ G. DRINKING WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ H. WORKER EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 WORKERS POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ I. POPULATION EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
IL	ILD 000 666 180

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

N/A

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

N/A

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

N/A

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

N/A

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

N/A

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS — ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

N/A

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

N/A

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

N/A

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

The site is currently used solely as a warehouse. No hazardous waste has been stored or managed since 1985. The facility has undergone RCRA closure.

V. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

IEPA, 1986. Closure Inspection Report, January 29.

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Travenol Laboratories, Inc.
3860 Sunset Avenue
Waukegan, Illinois

ILD 000 666 180

Date:	April 23, 1991
Facility Representatives:	Sharon Carter, Plant Manager Robert Bartholomew, Manager, Environmental Compliance Richard E. Heizer, P.E., Environmental Engineer.
Inspection Team:	William Dytrych, RAI Ramona Reints, RAI
Photographer:	Ramona Reints
Weather Conditions:	Sunny, 50°F
Summary of Activities:	RAI conducted a VSI at the facility. The VSI consisted of walking through the facility, observing current and past waste disposal areas. Interviews with plant personnel were also conducted. There is no longer any hazardous waste management at the site, and all previous storage and treatment areas have been closed in accordance with an IEPA-approved closure plan.

Photograph No. 1 Location: SWMU 2
Orientation: West Date: 04/23/91
Description: This is the location of the former floor drain for the Former Freon Recovery Still (SWMU 2). The drain has been since filled in with concrete. The still was removed in 1984.

Photograph No. 2 Location: SWMU 1
Orientation: Southeast Date: 04/23/91
Description: This is the location of one of the Former Drum Storage Areas (SWMU 1), labelled No. 2 on Figure 3. No hazardous waste has been handled in this area since September 1985. The floor is currently in good condition.

Photograph No. 3 Location: SWMU 1
Orientation: East Date: 04/23/91
Description: This is the location of one of the Former Drum Storage Areas (SWMU 1), labelled No. 1 on Figure 3. No hazardous waste has been handled in this area since September 1985. The floor is currently in good condition.

Photograph No. 4 Location: SWMU 2
Orientation: Northeast Date: 04/23/91
Description: This is the location of one of the Former Drum Storage Areas (SWMU 1), labelled No. 6 on Figure 3. No hazardous waste has been handled in this area since September 1985. The floor is currently in good condition.

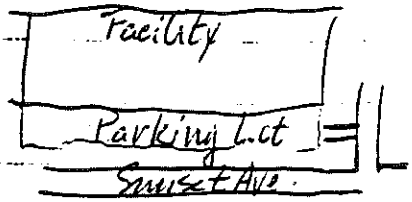
ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

Travenol 3860 Sunset Waukegan ILD 000666180
4/23/91

1) Company name
2) Mr. Bartholomew's title
11/1/76 3) Site history – year purchased; warehouse built; previous owner(s).
Myristate oil Freon Still bottoms 4) Facility function: new; previously
5) Wastes (hazardous & non-hazardous)
6) Permits (Ill. air permit 09050004)
7) Current regulation status (e.g. storage facility?)

Sunny ~50°F. William Dytrych Susan Carter (plant manager)
Ramona Reints Robert Bartholomew (Mgr.-envir. comp.)
Heizer (P.E.)



lease bldg. (Talisen Mgmt.)
since late '88, 1989

Baxter/Travenol
removed late 1984 (July) Travenol - mfg - distn. efr.
4/15/85 closure plan 1981 - Freon recovery
1981 - 1984
No haz waste before or since
CF dialyzer: cleansing
Myristate oil:

Freon: checked for spec's.
redistilled
or sold: Custom Organics, Inc Kesse (Safety-Kleen)

Non-haz: Tetsun disposal.
~1/wk.

Air permit:
N.S San. Dist: discharging of waste water
Today, sanitary discharge only

Not TSD or generator.

Occupy 3/4 of Bldg.

Drain to sanitary sewer system

Concrete flooring.

Non-haz disposal area by far west bay.

Please send copy of report.

TRAVENOL LABORATORIES, INC.

P.O. Box 490
Round Lake, Illinois 60073

March 11, 1986

RCRA Activities
Region V
P. O. Box A3587
Chicago, IL 60690

Attention: ATKJG

Re: ILD082939067
ILD067989723
ILD000666180

Dear Sir or Madam:

Please find enclosed the certification statement for Travenol's three Illinois facilities. These certifications are completed at your request for our Morton Grove, Waukegan and Round Lake sites. If you have any questions, please do not hesitate to contact me at (312) 546-6311, Ext. 2739.

Sincerely,

P S Bartholomew

Patricia S-Bartholomew
Manager, Safety and Environment

PSB:jas
encl.

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: TRAVENOL LABORATORIES, INC.

EPA I.D. NUMBER: ~~ILD082939067~~ ILD 000 666 180

LOCATION CITY: ~~MORTON GROVE~~ WAUKEGAN

STATE: ILLINOIS

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
° Landfill		X
° Surface Impoundment		X
° Land Farm		X
° Waste Pile		X
° Incinerator	X	
° Storage Tank (Above Ground)	X	
° Storage Tank (Underground)		X
° Container Storage Area		X
° Injection Wells		X
° Wastewater Treatment Units		X
° Transfer Stations		X
° Waste Recycling Operations		X
° Waste Treatment, Detoxification		X
° Other _____		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

A) The incinerator is a biomedical incinerator used to destroy type 4 Pathological waste which under RCRA is not regulated. The wastestream consists mainly of animal carcasses and bacteriological wastes. Small amounts of lab process wastes which are exempt are also burned as are confidential documents. The incinerator was operated for approximately**

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

** See Page that follows.

8 hours per day, 5 days per week at an average laoding of approximately 400 pounds per hour. The volume of waste destroyed is dependent on the operations of the facility which are not constant and vary from month to month.

B) Elementary neutralization of corrosive waste resulting from the deionization of well water is treated in an aboveground 5,000 gallon lined tank. Either acid or base is used depending on whether the anion or catron columns are regenerated. The neutralized waste is then discharged to the Metropolitan Sanitary District of Greater Chicago usually on a monthly basis in volumes that are approximately 3,000 gallons or less.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

NO RELEASES KNOWN

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

NOT APPLICABLE PER THE ABOVE.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Patricia S.-Bartholomew, Mgr. Safety & Environment
Typed Name and Title

P S Bartholomew
Signature

3-11-86
Date

CERTIFICATION REGARDING POTENTIAL RELEASES FROM SOLID WASTE MANAGEMENT UNITS

PLEASE NOTE: AS OF JANUARY 14, 1986, THIS HAZARDOUS WASTE FACILITY IS CLOSED

FACILITY NAME: TRAVENOL LABORATORIES, INC.

EPA I.D. NUMBER: ILD 000 666 180

LOCATION CITY: WAUKEGAN

STATE: ILLINOIS

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
° Landfill		X
° Surface Impoundment		X
° Land Farm		X
° Waste Pile		X
° Incinerator		X
° Storage Tank (Above Ground)		X
° Storage Tank (Underground)		X
° Container Storage Area		X
° Injection Wells		X
° Wastewater Treatment Units		X
° Transfer Stations		X
° Waste Recycling Operations		X
° Waste Treatment, Detoxification		X
° Other _____		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

NOT APPLICABLE

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

NO RELEASES KNOWN

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

PATRICIA S.-BARTHOLOMEW, Mgr. Safety & Environment
Typed Name and Title

P S Bartholomew
Signature

2-28-86
Date

PLEASE NOTE: AS OF JANUARY 14, 1986, THIS HAZARDOUS WASTE FACILITY IS CLOSED.